

BluOr Bank AS
DISCLOSURE INFORMATION
STATEMENT (PILLAR 3)
2024

www.bluorbank.lv

BluOr Bank AS (hereinafter – the Bank) publishes this information notice, disclosing information regarding the year 2024 in accordance with the Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012.

For disclosure purposes, the Bank uses the templates laid down in Commission Implementing Regulation (EU) 2021/637 of 15 March 2021 laying down implementing technical standards with regard to public disclosures by institutions of the information referred to in Titles II and III of Part Eight of Regulation (EU) No 575/2013 of the European Parliament and of the Council and repealing Commission Implementing Regulation (EU) No 1423/2013, Commission Delegated Regulation (EU) 2015/1555, Commission Implementing Regulation (EU) 2016/200 and Commission Delegated Regulation (EU) 2017/2295, in which the figures are stated in thousands of euros (EUR `000) as at the end of the reporting period (31 December 2024).

Considering that the Bank does not apply the IRB approach, the internal model method, or the internal model approach for market risk in its operations, and does not engage in certain transactions or provide specific financial services (for example, collateral in derivative transactions, exposures to central counterparties, securitisation exposures in the non-trading portfolio, credit derivative exposures, or equity instruments held by insurance or reinsurance undertakings or insurance holding companies which are not deducted from own funds), and is not part of a financial conglomerate, the Bank therefore does not disclose templates EU CR8, EU CCR7, EU MR2-B, EU CR10, EU CCR4, EU CCR5, EU CCR7, EU CCR8, EU SEC1, EU SEC2, EU SEC3, EU SEC4, EU SEC5, EU CR6, EU CR7-A, EU CR7, EU MR2-A, EU MR3, EU MR4, EU INS1, EU INS2, EU CRE, EU CR6-A, EU CR9, EU CR9.1, EU CCR6, EU SECA, EU MRB at this time.

The disclosure statement is provided at the level of the prudential consolidation group (hereinafter – the Group).

BluOr Bank AS Disclosure Information Statement (Pillar 3) 2024.	2
Template EU OV1 – Overview of total risk exposure amounts	5
Template EU KM1 – Key metrics template.....	6
Table EU OVB – Disclosure on governance arrangements.....	8
Template EU LI1 – Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories with regulatory risk categories	11
Template EU LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements	13
Template EU LI3 – Outline of the differences in the scopes of consolidation (entity by entity)	14
Table EU LIA – Explanations of differences between accounting and regulatory exposure amounts	15
Template EU PV1 – Prudent valuation adjustments (PVA)	16
Table EU LIB – Other qualitative information on the scope of application	17
Template EU CC1 – Composition of regulatory own funds	18
Template EU CC2 – Reconciliation of regulatory own funds to balance sheet in the audited financial statements	23
Template EU CCA – Main features of regulatory own funds instruments and eligible liabilities instruments	24
Template EU CCyB1 – Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer.....	25
Template EU CCyB2 – Amount of institution-specific countercyclical capital buffer.....	27
Template EU LR1 – LRSum: Summary reconciliation of accounting assets and leverage ratio exposures... ..	28
Template EU LR2 – LRCom: Leverage ratio common disclosure	29
Template EU LR3 – LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)	31
Template EU LIQ1 – Quantitative information of LCR.....	32
Table EU LIQB on qualitative information on LCR, which complements template EU LIQ1	34
Template EU LIQ2 : Net Stable Funding Ratio	35
Template EU CQ3 : Credit quality of performing and non-performing exposures by past due days	37
Template EU CR1-A : Maturity of exposures	38
Template EU CR2 : Changes in the stock of non-performing loans and advances	39
Template EU CR1 : Performing and non-performing exposures and related provisions	40
Template EU CQ1 : Credit quality of forborne exposures	41
Template EU CQ7 : Collateral obtained by taking possession and execution processes	42
Template EU CQ4 : Quality of non-performing exposures by geography	43
Template EU CQ5 : Credit quality of loans and advances to non-financial corporations by industry	44
Template EU CR2a : Changes in the stock of non-performing loans and advances and related net accumulated recoveries	45
Template EU CQ2 : Quality of forbearance	46
Template EU CQ6 : Collateral valuation – loans and advances	47
Template EU CQ8 : Collateral obtained by taking possession and execution processes – vintage breakdown	48
Template EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques	49

Template EU CR4 – Standardised approach – Credit risk exposure and CRM effects	50
Template EU CR5 – Standardised approach	51
Template EU CCR1 – Analysis of CCR exposure by approach	52
Template EU CCR2 – Transactions subject to own funds requirements for CVA risk	53
Template EU CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights	54
Template EU MR1 – Market risk under the standardised approach	55
Table EU ORA – Qualitative information on operational risk	56
Template EU OR1 – Operational risk own funds requirements and risk-weighted exposure amounts	58
Template EU IRRBB1 – Interest rate risks of non-trading book activities	59
Table EU IRRBBA – Qualitative information on interest rate risk of non-trading book activities	60
Table EU REMA – Remuneration policy	63
Template EU REM1 – Remuneration awarded for the financial year	65
Template EU REM2 – Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)	66
Template EU REM3 – Deferred remuneration	67
Template EU REM4 – Remuneration of 1 million EUR or more per year	68
Template EU REM5 – Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)	69
Template EU AE1 – Encumbered and unencumbered assets	70
Template EU AE2 – Collateral received and own debt securities issued	71
Template EU AE3 – Sources of encumbrance	72
Qualitative information on Environmental risk	73
Qualitative information on Social risk	75
Qualitative information on Governance risk	77
Banking book – Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	78
Banking book – Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral	79
Banking book – Climate change transition risk: Alignment metrics	80
Banking book – Climate change transition risk: Exposures to top 20 carbon-intensive firms	82
Banking book – Climate change physical risk: Exposures subject to physical risk	83
Summary of GAR KPIs	84
Mitigating actions: Assets for the calculation of GAR	85
Mitigating actions: GAR (%)	86
Other climate change mitigating actions that are not covered in the EU Taxonomy	87

Template EU OV1 – Overview of total risk exposure amounts.

EUR' 000

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
		T	T-1	T
1	Credit risk (excluding CCR)	583 202	551 780	46 656
2	Of which the standardised approach	583 202	551 780	46 656
3	Of which the Foundation IRB (F-IRB) approach			
4	Of which slotting approach			
EU 4.a	Of which equities under the simple riskweighted approach			
5	Of which the Advanced IRB (A-IRB) approach			
6	Counterparty credit risk - CCR	-	-	-
7	Of which the standardised approach	-	-	-
8	Of which internal model method (IMM)			
EU 8.a	Of which exposures to a CCP			
EU 8b	Of which credit valuation adjustment - CVA	-	-	-
9	Of which other CCR			
10	Not applicable			
11	Not applicable			
12	Not applicable			
13	Not applicable			
14	Not applicable			
15	Settlement risk	-	-	-
16	Securitisation exposures in the non-trading book (after the cap)			
17	Of which SEC-IRBA approach			
18	Of which SEC-ERBA (including IAA)			
19	Of which SEC-SA approach			
EU 19.a	Of which 1250% / deduction			
20	Position, foreign exchange and commodities risks (Market risk)	-	-	-
21	Of which the standardised approach	-	-	-
22	Of which IMA			
EU 22.a	Large exposures			
23	Operational risk	69 317	57 669	5 545
EU 23.a	Of which basic indicator approach	69 317	57 669	5 545
EU 23.b	Of which standardised approach	-	-	-
EU 23.c	Of which advanced measurement approach	-	-	-
24	"Amounts below the thresholds for deduction (subject to 250% risk weight)"	-	-	-
25	Not applicable			
26	Not applicable			
27	Not applicable			
28	Not applicable			
29	Total	652 519	609 449	52 201

Template EU KM1 – Key metrics template.

EUR'000

		a	b	c	d	e
		T	T-1	T-2	T-3	T-4
Available own funds (amounts)						
1	Common Equity Tier 1 (CET1) capital	81 697	73 018	72 779	72 556	74 372
2	Tier 1 capital	90 406	81 727	81 488	78 616	75 472
3	Total capital	119 545	90 566	88 263	85 358	82 245
Risk-weighted exposure amounts						
4	Total risk exposure amount	652 518	609 449	555 707	546 085	527 036
Capital ratios (as a percentage of risk-weighted exposure amount)						
5	Common Equity Tier 1 ratio (%)	12.5202%	11.9809%	13.0967%	13.2865%	14.1113%
6	Tier 1 ratio (%)	13.8549%	13.4099%	14.6639%	14.3962%	14.3200%
7	Total capital ratio (%)	18.3205%	14.8603%	15.8830%	15.6309%	15.6052%
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)						
EU 7.a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.2000%	2.2000%	2.2000%	2.6000%	2.6000%
EU 7.b	of which: to be made up of CET1 capital (percentage points)	1.2375%	1.2375%	1.2375%	1.4625%	1.4625%
EU 7.c	of which: to be made up of Tier 1 capital (percentage points)	1.6500%	1.6500%	1.6500%	1.9500%	1.9500%
EU 7.d	Total SREP own funds requirements (%)	10.2000%	10.2000%	10.2000%	10.6000%	10.6000%
Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)						
8	Capital conservation buffer (%)	2.5000%	2.5000%	2.5000%	2.5000%	2.5000%
EU 8.a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
9	Institution specific countercyclical capital buffer (%)	0.5233%	0.1737%	0.1830%	0.2123%	0.1200%
EU 9.a	Systemic risk buffer (%)	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
10	Global Systemically Important Institution buffer (%)	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
EU 10.a	Other Systemically Important Institution buffer (%)	0.2500%	0.2500%	0.2500%	0.2500%	0.2500%
11	Combined buffer requirement (%)	3.2733%	2.9237%	2.9330%	2.9623%	2.5000%
EU 11.a	Overall capital requirements (%)	13.4733%	13.1237%	13.1330%	13.5623%	13.4700%
12	CET1 available after meeting the total SREP own funds requirements (%)	6.2049%	4.6603%	5.6830%	5.0309%	5.0052%
Leverage ratio						
13	Total exposure measure	1 090 931	942 264	992 867	948 808	797 337
14	Leverage ratio (%)	8.2870%	8.6734%	8.2074%	8.2857%	9.4654%

Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)						
EU 14.a	Additional own funds requirements to address the risk of excessive leverage (%)	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
EU 14.b	of which: to be made up of CET1 capital (percentage points)	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
EU 14.c	Total SREP leverage ratio requirements (%)	3.0000%	3.0000%	3.0000%	3.0000%	3.0000%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)						
EU 14.d	Leverage ratio buffer requirement (%)	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
EU 14.e	Overall leverage ratio requirement (%)	3.0000%	3.0000%	3.0000%	3.0000%	3.0000%
Liquidity Coverage Ratio						
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	442 209	396 766	421 574	393 032	245 252
EU 16.a	Cash outflows - Total weighted value	296 649	264 150	305 845	238 236	159 857
EU 16.b	Cash inflows - Total weighted value	16 649	14 991	22 818	17 933	13 079
16	Total net cash outflows (adjusted value)	280 001	249 159	283 027	220 303	146 778
17	Liquidity coverage ratio (%)	157.9314%	159.2422%	148.9520%	178.4049%	167.0904%
Net Stable Funding Ratio						
18	Total available stable funding	597 675	567 584	571 325	592 797	533 805
19	Total required stable funding	453 995	366 324	396 905	380 259	370 546
20	NSFR ratio (%)	130.6518%	148.7602%	139.1664%	148.6266%	137.2607%

Table EU OVB – Disclosure on governance arrangements.

Row number	Explanation
a)	<p>The number of directorships held by members of the management body.</p> <ol style="list-style-type: none"> Supervisory function in the Bank - 5 Supervisory function in the Group - 8 Management function in the Bank - 3 Management function in the Group - 7 Other senior management members in the Bank - 6 Other senior management members in the Group - 6
b)	<p>When disclosing information regarding the recruitment policy for the selection of members of the management body, the Bank publishes information about their actual knowledge, skills, and expertise, details of the succession planning policy, and anticipated changes in the overall composition of the management body.</p> <p>The Bank informs that the aforementioned requirements are observed in the commercial companies included in the prudential consolidation group, hereinafter referred to as the Group, which are established based on the Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012, the Credit Institutions Law, and the Bank of Latvia's regulatory requirements No. 266, "Regulations for the Application of Options Provided for in Directly Applicable European Union Legal Acts on Prudential Requirements".</p> <p>Selection process and initial assessment of candidate suitability</p> <p>Members of the supervisory boards, management boards, and other senior management members (executive officers and directors) of the Bank and the Bank's parent commercial company, who are recognized as persons performing key functions in accordance with the Bank of Latvia's regulatory requirements No. 343, "Regulations on the Assessment of the Suitability of Officials of Credit Institutions and Investment Firms" (hereinafter referred to as the "Regulations"), are hereinafter referred to as "Persons".</p> <p>The selection process for Persons is conducted by announcing an internal or external recruitment competition and/or by using the services of personnel recruitment companies.</p> <p>Before approving a Person for a position, the Bank or the Bank's parent commercial company conducts an initial assessment of a candidate selected through an external competition or an individual suitability assessment of a candidate chosen through an internal competition, including an evaluation of the sufficient level of knowledge, skills, and expertise.</p> <p>In addition, a candidate for the position of a supervisory board (council) or management board member undergoes an evaluation of their expected ability to devote sufficient time to fulfilling their duties, as well as an assessment of the diversity of the supervisory or management board as a collective.</p> <p>When evaluating whether supervisory board members meet the criteria for independence, the Bank takes into account the requirements set out in laws and regulations regarding the governance system for independent supervisory board members, as well as the criteria outlined in paragraph 89 of the "Guidelines on the assessment of the suitability of members of the management body and key function holders" of the European Banking Authority and the European Securities and Markets Authority (EBA/PN/2021/06; ESMA35-36-2319), dated 2 July 2021. The Bank carefully analyses any situation mentioned in the criteria that, in itself, does not preclude a supervisory board member from being independent, and ensures the ability of supervisory board members to make objective and well-considered judgments and take independent decisions.</p> <p>Candidates for the position of a supervisory board member are selected by the shareholders' meeting; candidates for the position of a management board member are selected by the supervisory board; candidates for the position of CEO or director are selected by the management board, or in certain cases by the supervisory board, when it falls within its competence. The assessment of candidates is based on information gathered from publicly available external registers, media sources, and educational qualifications.</p> <p>Candidates for the positions of supervisory board member, management board member, risk director, head of the internal audit department, the person responsible for compliance with anti-money laundering and counter-terrorism and proliferation financing requirements, and the person responsible for operational compliance control, are coordinated with the Bank of Latvia prior to their appointment.</p> <p>The selection of other candidates for the management bodies of commercial companies in the Republic of Latvia, at the level of the prudential consolidation group, is carried out in accordance with the requirements of the Credit Institutions Law of the Republic of Latvia. Whereas the selection of candidates for the management body of foreign commercial companies is carried out in compliance with the requirements of equivalent regulations of the country in which the commercial company is located.</p> <p>All candidates are required to meet the criteria set out in the approved Bank strategy and possess the necessary competencies in the relevant area of governance, taking into account the role of the position and the description of the skills required.</p> <p>When selecting members of the supervisory board and management board of the Bank or BBG, the Bank considers giving preference, in specific cases, to the underrepresented gender, provided that:</p> <ol style="list-style-type: none"> The candidate of the underrepresented gender is equally qualified in terms of suitability, competence, and professional performance as the candidate of the other gender; Such preference is not automatic or unconditional; this preference may be disregarded if there are reasons specific to a candidate of the other gender that justify choosing that candidate instead; Each candidate's application is evaluated objectively by applying all selection criteria individually to each candidate.

Assessment of suitability

The Bank conducts the assessment of individual suitability of the members of the supervisory board and management board whenever it becomes necessary due to certain circumstances or events, based on the procedure set out in the Regulations.

In ensuring the ongoing monitoring of the individual and collective suitability of the members of the supervisory board and management board, the Bank takes into account each member's individual and collective performance, as well as relevant events leading to a re-assessment of suitability.

The Bank ensures that the Persons consistently maintain an impeccable reputation, the necessary competence, and sufficient knowledge, skills, and expertise to carry out their daily duties in accordance with the standards established in the corporate values of the institution.

Once a year, the Bank conducts a suitability assessment of the Persons and an assessment of the effectiveness of the collective performance of the supervisory board and management board (hereinafter referred to as the "Assessment"), in accordance with the requirements of the Regulations.

The suitability assessment is carried out with the aim to:

1. Determine the actual knowledge, competence, and skills of the Persons;
2. Ensure that the Persons possess appropriate qualifications, sufficient experience, and impeccable reputation, based on the current information available to the Bank and published in external sources and databases;
3. Analyse and identify the strengths in the performance of the Persons as well as areas that require improvement;
4. Identify existing and missing competencies of the Persons, the need for training, or the need for corrective measures;
5. Assess whether the structure and composition of the management board and supervisory board are aligned with the achievement of the strategic business objectives;
6. Determine the ability of the members of the management board and supervisory board to act in accordance with the Bank's corporate values and standards of professional conduct and ethics, including the ability to act independently, critically assess and, if necessary, challenge decisions made, as well as effectively supervise the decision-making process, insofar as it relates to the specific duties of the respective member of the supervisory board or management board;
7. Assess the ability to devote sufficient time to the performance of their duties (including within committees);
8. Evaluate the compliance of the number of positions held by the respective member of the supervisory board or management board with the limitations set out in Section 26.1 of the Credit Institutions Law.

In accordance with the above, the Bank has conducted a repeated suitability assessment of the Persons for their respective positions, taking into account the achievements of 2023 and based on the criteria that define the required levels of knowledge, skills, experience, and personal qualities.

When evaluating the individual or collective performance of the members of the supervisory board and management board in accordance with Paragraph 27 of the Regulations, the Bank analyses all available information and also considers the job responsibilities and reporting procedures assigned to a member of the supervisory board or management board in order to determine whether any significant fact or finding should be attributed to one or more responsible members of the supervisory board or the management board, and whether there is any disconnect between their individual role and their job responsibilities within the supervisory board or management board and those findings.

The results of the Assessment confirm that the Persons meet the established requirements to hold the aforementioned positions.

Based on the results of the Persons' Assessment, no violations or deficiencies of any kind were identified in 2024, as the Persons perform their official duties — including their functions and tasks — adequately and qualitatively, correctly performing the supervision and improvement of the processes under their responsibility; they organize, plan, and control the work of subordinate structural units, and ensure the management of processes in line with the Bank's business strategy and regulatory requirements.

The Assessment results were also used in the process of extending the mandates of the members of the supervisory board and management board, as well as in cases of changes to the composition of the supervisory board and management board. The results of the assessment of the suitability of the members of the supervisory board and management board for their positions, as well as the effectiveness of their performance, were submitted to the Bank of Latvia in a consolidated form.

Succession planning

The Bank has developed a succession planning policy to ensure business continuity, with the aim of timely identifying succession candidates who can replace the Persons in situations of prolonged absence, termination of employment or mandate agreements, or when it becomes necessary to remove all or several members of the supervisory board or management board from their official duties at the same time.

The succession planning policy is based on fundamental principles of succession identification, including the assessment of the current situation, the recognition of potential successors, and their designation.

If necessary, successors are provided with a succession training plan so that the Persons can timely transfer their unique knowledge and competencies to the successors, who after a certain period may take over these positions. Succession has a very important purpose and a strategically significant role in ensuring the Bank's sustainability, as the transfer of competence and knowledge helps maintain the continuity of the duties performed by the Bank's Persons.

The succession plans and the list of succession candidates are approved by the Bank's management board and supervisory board, in accordance with the designated authorisation.

The Bank conducts the succession planning process every three years, utilizing the results of individual and collective suitability assessments, career development trends, work performance outcomes, and the existing levels of individual knowledge, skills, and abilities. If necessary, the Bank also conducts surveys or interviews with these Persons.

c)	<p>Diversity policy</p> <p>The Bank implements a diversity policy regarding the composition of the supervisory board and management board of the Bank or BBG, and follows the Group-level diversity policy to achieve its strategic goals. The principles of the diversity policy allow for:</p> <ol style="list-style-type: none"> 1. The inclusion of a wide range of competencies and attributes; 2. Achieving diversity of opinions and experiences; 3. Promoting independent views, critical evaluation of issues, and effective decision-making. <p>The diversity policy is implemented in compliance with the requirements set forth in regulatory enactments, including taking into account the decisions made by the Bank's Nomination and Remuneration Committee regarding:</p> <ol style="list-style-type: none"> 1. The target for achieving adequate representation of the underrepresented gender on the supervisory board and management board of the Bank or BBG; 2. The review and updating of the diversity policy to achieve this goal; 3. The objectives, diversity policy, and the disclosure of information on its implementation in accordance with Article 435(2)(c) of the Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012; 4. Policies and procedures, which include planned actions and measures to ensure the achievement of the quantitative target regarding the representation of the underrepresented gender in the supervisory board and management board structures; 5. Additional measures if it is determined that the previously set targets have not been achieved within the specified time frame; 6. Provision of recommendations to the supervisory board and management board to ensure compliance with the principles of equality, diversity, and inclusion. <p>When planning the diversity policy and succession within the supervisory board and the management board, the Bank adheres to the following criteria:</p> <ol style="list-style-type: none"> 1. Diversity in education and professional experience covering all functions and responsibilities of the supervisory/ management board; 2. Where possible, ensuring representation of different age groups; 3. Where possible, ensuring representation of both genders in the composition of the supervisory board and management board; 4. Diversity in geographical origin of individual members of the supervisory/ management board, taking into account the established strategic objectives. <p>When planning the diversity policy, the Bank ensures the achievement of quantitative targets regarding the representation of the underrepresented gender in the composition of the supervisory board or management board within the timeframe set by the Bank's supervisory board. It is established that in the event of changes in the composition of the supervisory board or management board, an assessment is made to determine whether the proportion of the underrepresented gender is at least 30 % or as close as possible to 30 %, but not exceeding 49 %.</p> <p>When setting the goals of the diversity policy, the Bank takes into account the results of comparative diversity assessments published by the Bank of Latvia, the European Banking Authority, or other relevant international organisations.</p> <p>The Bank ensures that the objectives set out in the diversity policy are taken into account when appointing a new member to the supervisory board or the management board, as well as when promoting another Person to a supervisory board or management board position. The Bank provides genuinely equal opportunities for all new candidates, applying non-discriminatory conditions with respect to gender and maintaining a balanced approach without favouring candidates of the opposite gender.</p> <p>When conducting the individual assessment of the members of the supervisory board and the management board, the Bank also evaluates their collective suitability, including consideration of the Bank's policy on ensuring diversity.</p> <p>The Bank's and the Group's sustainability goals, including in the area of human resource management, are defined with reference to the 17 Sustainable Development Goals outlined in the 2015 United Nations General Assembly resolution 'Transforming our world: the 2030 Agenda for Sustainable Development'.</p> <p>The Bank and the Group promote staff diversity and inclusion, adhering to the principles of equality with the aim of fostering an inclusive work environment where employees feel supported and valued regardless of their professional background, education, age, gender, geographic origin, sexual orientation, or disability.</p> <p>The Bank and the Group promote employee well-being, social and emotional welfare, and support mental health, resilience, and development in a sustainable manner. Employee remuneration is reviewed annually, aiming to ensure equal pay for equivalent work for all women and men, including youth and persons with disabilities, wherever possible.</p> <p>The Bank and the Group continuously improve the quality of the working environment with the goal of providing high-quality workplaces and adapting work and rest areas to meet employee needs.</p> <p>The Bank and the Group care for employee health by implementing occupational safety measures, providing access to health insurance, and improving the ergonomics of existing workplaces to accommodate specific needs or individual requirements.</p> <p>When creating new jobs, the Bank and the Group take into account significant labour market changes related to sustainable transformation, encouraging employee participation in sustainability-promoting projects (for example, organizing charity activities and the annual 'Big Clean-up' initiative ("Lielā talka"), improving recreational areas, etc.) and ensuring sustainable human resource management (e.g., by digitizing work processes, offering remote work opportunities, and providing access to online training).</p>
d)	In accordance with the regulatory framework governing the Bank's operations, the Bank maintains an active Risk Committee and a Nomination and Remuneration Committee.
e)	-

Template EU LI1 - Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories with regulatory risk categories.

		a	b	c	d	e	f	g
		Carrying values as reported in published financial statements	Carrying values under scope of prudential consolidation	Carrying values of items				
				Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework	Not subject to own funds requirements or subject to deduction from own funds
	Breakdown by asset clases according to the balance sheet in the published financial statements							
1	Cash, cash balances at central banks	409 545	409 545	409 545	-	-	-	-
2	On-demand claims on credit institutions	7 730	7 730	7 730	-	-	-	-
3	Financial assets measured at fair value through profit or loss	543	543	543	-	-	-	-
	of which: derivatives	-	-	-	-	-	-	-
4	"Financial assets measured at fair value through other comprehensive income"	14 337	14 337	14 337	-	-	-	-
5	Financial assets measured at amortised cost	566 212	566 212	566 212	-	-	-	-
6	"Investment in subsidiaries, associate and joint ventures"	827	827	827	-	-	-	-
7	Tangible assets	23 701	23 701	23 701	-	-	-	-
8	Intangible assets	1 105	1 105	-	-	-	-	1 105
9	Tax assets	1	1	1	-	-	-	-
10	Other assets	11 471	11 471	11 471	-	-	-	-
11	Non-current assets and disposal groups classified as held for sale	-	-	-	-	-	-	-
	Total assets	1 035 473	1 035 473	1 034 368	-	-	-	1 105
	Breakdown by liability classes according to the balance sheet in the published financial statements							
1	"Financial liabilities measured at fair value through profit or loss"	-	-	-	-	-	-	-
2	Financial liabilities measured at amortised cost	928 206	928 206	-	-	-	-	928 206
	of which: deposits	894 022	894 022	-	-	-	-	894 022
	of which: debt securities issued	34 184	34 184	-	-	-	-	34 184
3	Provisions	121	121	121	-	-	-	-
4	Tax liabilities	4 455	4 455	-	-	-	-	4 455
5	Other liabilities	8 403	8 403	-	-	-	-	8 403

	Shareholders' Equity	-	-	-	-	-	-	-
6	Paid up capital	49 943	49 943	-	-	-	-	49 943
7	Profit or loss attributable to Owners of the parent	17 223	17 223	-	-	-	-	17 223
8	Retained earnings	27 860	27 860	-	-	-	-	27 860
9	Other reserves	24	24	-	-	-	-	24
10	Changes in fair value of equity instruments measured at fair value through other comprehensive income	-335	-335	-	-	-	-	-335
11	Fair value changes of debt instruments measured at fair value through other comprehensive income	-428	-428	-	-	-	-	-428
	Total liabilities	1 035 473	1 035 473	121	-	-	-	1 035 351

Template EU LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements.

		a	b	c	d	e
		Total	Items subject to			
			Credit risk framework	Securitisation framework	CCR framework	Market risk framework
1	Assets carrying value amount under the scope of prudential consolidation (as per template LI1)	1 034 368	1 034 368	-	-	-
2	Liabilities carrying value amount under the scope of prudential consolidation (as per template LI1)	-121	-121	-	-	-
3	Total net amount under the scope of prudential consolidation	1 034 246	1 034 246	-	-	-
4	Off-balance-sheet amounts	121 393	121 393	-	-	
5	Differences in valuations	-	-	-	-	
6	Differences due to different netting rules, other than those already included in row 2	-	-	-	-	
7	Differences due to consideration of provisions	-	-	-	-	
8	Differences due to the use of credit risk mitigation techniques (CRMs)	-	-987	-	-	
9	Differences due to credit conversion factors	-	-66 213	-	-	
10	Differences due to Securitisation with risk transfer	-	-	-	-	
11	Other differences	-	29	-	-	
12	Exposure amounts considered for regulatory purposes	-	1 088 469	-	-	

Template EU LI3 - Outline of the differences in the scopes of consolidation (entity by entity).

a	b	c	d	e	f	g	h
Name of the entity	Method of accounting consolidation	Method of prudential consolidation					Description of the entity
		Full consolidation	Proportional consolidation	Equity method	Neither consolidated nor deducted	Deducted	
<i>BBG AS</i>	<i>Full consolidation</i>	<i>X</i>					<i>Holding companies' activities</i>
<i>BluOr Bank AS</i>	<i>Full consolidation</i>	<i>X</i>					<i>Credit institution</i>
<i>BluOr International SIA</i>	<i>Full consolidation</i>	<i>X</i>					<i>Property transactions</i>
<i>ZapDvina Development SIA</i>	<i>Full consolidation</i>	<i>X</i>					<i>Property transactions</i>
<i>Pils Pakalpojumi SIA</i>	<i>Full consolidation</i>	<i>X</i>					<i>Real estate management</i>
<i>Pulkarne Entity SIA</i>	<i>Full consolidation</i>	<i>X</i>					<i>Property transactions</i>
<i>Kamaly Development EOOD</i>	<i>Full consolidation</i>	<i>X</i>					<i>Property transactions</i>
<i>Foxtran Management Ltd.</i>	<i>Full consolidation</i>	<i>X</i>					<i>Bank's Assumed Loan Collateral Management</i>
<i>Kamaly Development UAB</i>	<i>Full consolidation</i>	<i>X</i>					<i>Bank's Assumed Loan Collateral Management</i>
<i>Jēkaba 2 SIA</i>	<i>Full consolidation</i>	<i>X</i>					<i>Property transactions</i>
<i>Thormano Limited</i>	<i>Full consolidation</i>	<i>X</i>					<i>Information and communication services</i>
<i>Hazee Shipping Corp</i>	<i>Full consolidation</i>	<i>X</i>					<i>Financial leasing services</i>

Table EU LIA – Explanations of differences between accounting and regulatory exposure amounts.

Legal basis	Row number	Qualitative information - Free format
Article 436(b) CRR	(a)	Differences between columns (a) and (b) in template EU LI1
Article 436(d) CRR	(b)	Qualitative information on the main sources of differences between the accounting and regulatory scope of consolidation shown in template EU LI2

Template EU PV1 – Prudent valuation adjustments (PVA).

The Group does not adopt the basic approach for determining the additional valuation allowance for prudent valuation allowance for prudent valuation under Chapter III of Commission Delegated Regulation (EU) 2016/101 as it meets the conditions for applying the simplified approach

Table EU LIB – Other qualitative information on the scope of application.

There are no existing or foreseeable practical or legal impediments to the immediate transfer of equity items or repayment of liabilities between the Group's parent and subsidiaries. The Group has no information to disclose under Article 436(g)-(h) of the CRR.

Template EU CC1 – Composition of regulatory own funds.

EUR'000

		a)	b)
		Amounts	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	Capital instruments and the related share premium accounts	49 943	
	of which: Instrument type 1	49 943	
	of which: Instrument type 2	-	
	of which: Instrument type 3	-	
2	Retained earnings	16 753	
3	Accumulated other comprehensive income (and other reserves)	-739	
EU-3.a	Funds for general banking risk	-	
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1	-	
5	Minority interests (amount allowed in consolidated CET1)	-	
EU-5.a	Independently reviewed interim profits net of any foreseeable charge or dividend	17 223	
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	83 180	
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	-15	
8	Intangible assets (net of related tax liability) (negative amount)	-1 105	
9	Not applicable	-	
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	-	
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	-	
12	Negative amounts resulting from the calculation of expected loss amounts	-	
13	Any increase in equity that results from securitised assets (negative amount)	-	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	-	
15	Defined-benefit pension fund assets (negative amount)	-	
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	-	
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	

19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
20	Not applicable	-	
EU-20.a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	-	
EU-20.b	of which: qualifying holdings outside the financial sector (negative amount)	-	
EU-20.c	of which: securitisation positions (negative amount)	-	
ES-20.d	of which: free deliveries (negative amount)	-	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	-	
22	Amount exceeding the 17,65% threshold (negative amount)	-	
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	-	
24	Not applicable	-	
25	of which: deferred tax assets arising from temporary differences	-	
EU-25.a	Losses for the current financial year (negative amount)	-	
ES-25.b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	-	
26	Not applicable	-	
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-	
27.a	Other regulatory adjustments	-364	
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	-1 484	
29	Common Equity Tier 1 (CET1) capital	81 697	
Additional Tier 1 (AT1) capital: instruments			
30	Capital instruments and the related share premium accounts	8 709	
31	of which: classified as equity under applicable accounting standards	-	
32	of which: classified as liabilities under applicable accounting standards	8 709	
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1	-	
EU-33.a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1	-	
ES-33.b	Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1	-	
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	-	
35	of which: instruments issued by subsidiaries subject to phase out	-	
36	Additional Tier 1 (AT1) capital before regulatory adjustments	8 709	

Additional Tier 1 (AT1) capital: regulatory adjustments			
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)	-	
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	
41	Not applicable	-	
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	-	
42.a	Other regulatory adjustments to AT1 capital	-	
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	-	
44	Additional Tier 1 (AT1) capital	8 709	
45	Tier 1 capital (T1 = CET1 + AT1)	90 406	
Tier 2 (T2) capital: instruments			
46	Capital instruments and the related share premium accounts	29 139	
47	Amount of qualifying items referred to in Article 484(5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR	-	
EU-47.a	Amount of qualifying items referred to in Article 494a(2) CRR subject to phase out from T2	-	
ES-47.b	Amount of qualifying items referred to in Article 494b(2) CRR subject to phase out from T2	-	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	-	
49	of which: instruments issued by subsidiaries subject to phase out	-	
50	Credit risk adjustments	-	
51	Tier 2 (T2) capital before regulatory adjustments	29 139	
Tier 2 (T2) capital: regulatory adjustments			
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)	-	
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	
54.a	Not applicable	-	
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	
56	Not applicable	-	

EU-56.a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	-	
ES-56.b	Other regulatory adjustments to T2 capital	-	
57	Total regulatory adjustments to Tier 2 (T2) capital	-	
58	Tier 2 (T2) capital	29 139	
59	Total capital (TC = T1 + T2)	119 545	
60	Total Risk exposure amount	652 518	
Capital ratios and requirements including buffers			
61	Common Equity Tier 1 capital	12.52%	
62	Tier 1 capital	13.85%	
63	Total capital	18.32%	
64	Institution CET1 overall capital requirements	9.01%	
65	of which: capital conservation buffer requirement	2.50%	
66	of which: countercyclical capital buffer requirement		
67	of which: systemic risk buffer requirement		
EU-67.a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement		
ES-67.b	of which: additional own funds requirements to address the risks other than the risk of excessive leverage	1.24%	
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	6.20%	
National minima (if different from Basel III)			
69	Not applicable		
70	Not applicable		
71	Not applicable		
Amounts below the thresholds for deduction (before risk weighting)			
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)		
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)		
74	Not applicable		
75	Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)		
Applicable caps on the inclusion of provisions in Tier 2			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)		
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach		
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)		
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach		

Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)			
80	Current cap on CET1 instruments subject to phase out arrangements		
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)		
82	Current cap on AT1 instruments subject to phase out arrangements		
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)		
84	Current cap on T2 instruments subject to phase out arrangements		
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)		

Template EU CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements.

EUR'000

		a	c
		Balance sheet as in published financial statements	Reference
		As at period end	
Assets - Breakdown by asset classes according to the balance sheet in the published financial statements			
1	Cash, cash balances at central banks	409 545	
2	On-demand claims on credit institutions	7 730	
3	Financial assets measured at fair value through profit or loss	543	
4	"Financial assets measured at fair value through other comprehensive income"	14 337	
5	Financial assets measured at amortised cost	566 212	
6	"Investment in subsidiaries, associate and joint ventures"	827	
7	Tangible assets	23 701	
8	Intangible assets	1 105	Row 8 in the EU CC1 template
9	Tax assets	1	
10	Other assets	11 471	
11	Non-current assets and disposal groups classified as held for sale	-	
	Total assets	1 035 473	
Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements			
1	"Financial liabilities measured at fair value through profit or loss"	-	
2	Financial liabilities measured at amortised cost	928 206	
	of which: deposits	894 022	Partially line 46 in the EU CC1 template
	of which: debt securities issued	34 184	Partially line 30 in the EU CC1 template
3	Provisions	121	
4	Tax liabilities	4 455	
5	Other liabilities	8 403	
	Total liabilities	941 186	
Shareholders' Equity			
1	Paid up capital	49 943	Row 1 in EU CC1 template, instrument type 1
2	Profit or loss attributable to Owners of the parent	17 223	Partially line 2 in the EU CC1 template
3	Retained earnings	27 860	Row 2 in the EU CC1 template
4	Other reserves	24	Row 3 in the EU CC1 template
5	Changes in fair value of equity instruments measured at fair value through other comprehensive income	-335	Partially line 3 in the EU CC1 template
6	Fair value changes of debt instruments measured at fair value through other comprehensive income	-428	Partially line 3 in the EU CC1 template
		-	
	Total shareholders' equity	94 287	

Template EU CCA: Main features of regulatory own funds instruments and eligible liabilities instruments.

		a	b				c		d
		Share capital	"Unsecured subordinated bonds as tier-one additional own funds instruments (AT1)"				Subordinated liabilities: subordinated notes		Subordinated liabilities: subordinated loans
1	Issuer	BluOr Bank AS	BluOr Bank AS	BluOr Bank AS	BluOr Bank AS	BluOr Bank AS	BluOr Bank AS	BluOr Bank AS	BluOr Bank AS clients
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	Nr.40003551060	LV0000802437	LV0000802775	LV0000803195	LV0000803062	LV0000802569	LV0000804060	N/A
2.a	Public or private placement	Private	Private	Private	Private	Private	Public	Public	Private
3	Governing law(s) of the instrument	Latvia	Latvia	Latvia	Latvia	Latvia	Latvia	Latvia	Latvia
3.a	Contractual recognition of write down and conversion powers of resolution authorities	According to law	YES	YES	YES	YES	YES	YES	YES
	Regulatory treatment								
4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1 capital	Additional Equity Tier 1 capital	Additional Equity Tier 1 capital	Additional Equity Tier 1 capital	Additional Equity Tier 1 capital	Tier 2 capital	Tier 2 capital	Tier 2 capital
5	Post-transitional CRR rules	Common Equity Tier 1 capital	Additional Equity Tier 1 capital	Additional Equity Tier 1 capital	Additional Equity Tier 1 capital	Additional Equity Tier 1 capital	Tier 2 capital	Tier 2 capital	Tier 2 capital
6	Eligible at solo/(sub-)-consolidated/ solo&(sub-)-consolidated	Solo and (sub-)-consolidated	Solo and (sub-)-consolidated	Solo and (sub-)-consolidated	Solo and (sub-)-consolidated	Solo and (sub-)-consolidated	Solo and (sub-)-consolidated	Solo and (sub-)-consolidated	Solo and (sub-)-consolidated
7	Instrument type (types to be specified by each jurisdiction)	Shares	"Unsecured subordinated bonds"	"Unsecured subordinated bonds"	"Unsecured subordinated bonds"	"Unsecured subordinated bonds"	Subordinated bonds	Subordinated bonds	Subordinated loans
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	EUR 44.5	EUR 1.1	EUR 5.0	EUR 0.3	EUR 2.4	EUR 4.9	EUR 20.0	EUR 5.7
9	Nominal amount of instrument	The Bank's share capital consists of 31 781 081 shares	Nominal amount of instrument: 1 100 000	Nominal amount of instrument: 4 960 000	Nominal amount of instrument: 300 000	Nominal amount of instrument: 2 349 000	Nominal amount of instrument: 4 855 000	Nominal amount of instrument: 20 000 000	Nominal amount of instrument: 5 686 447
EU-9.a	Issue price	The value of one share is EUR 1.4	Issue price: 100 EUR	Issue price: 100 EUR	Issue price: 100 EUR	Issue price: 100 EUR	Issue price: 100 EUR	Issue price: 100 EUR	N/A
ES-9.b	Redemption price	-	EUR 1.1	EUR 5.0	EUR 0.3	EUR 2.4	EUR 4.9	EUR 20.0	EUR 5.7
10	Accounting classification	Shareholders' equity	Liabilities - at amortised cost	Liabilities - at amortised cost	Liabilities - at amortised cost	Liabilities - at amortised cost	Liabilities - at amortised cost	Liabilities - at amortised cost	Liabilities - at amortised cost
11	Original date of issuance	22.06.2001	19.10.2020	06.12.2023	31.05.2024	08.12.2024	30.05.2022	02.01.2024	Other
12	Perpetual or dated	Perpetual	Perpetual	Perpetual	Perpetual	Perpetual	Dated	Dated	Dated
13	Original maturity date	Perpetual	Perpetual	Perpetual	Perpetual	Perpetual	30.05.2022	02.10.2034	5-10 years
14	Issuer call subject to prior supervisory approval	YES	YES	YES	YES	YES	YES	YES	YES
15	Optional call date, contingent call dates and redemption amount	N/A	Redeemable after 5 years from issue	Redeemable after 5 years from issue	Redeemable after 5 years from issue	Redeemable after 5 years from issue	Redeemable after 5 years from issue	Redeemable after 5 years from issue	Redeemable after 5 years from issue
16	Subsequent call dates, if applicable	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Coupons / dividends								
17	Fixed or floating dividend/coupon	N/A	Fixed	Fixed	Fixed	Fixed	Fixed	Fixed	Fixed
18	Coupon rate and any related index	N/A	10%	13%	12%	11%	7%	10%	5%-6%
19	Existence of a dividend stopper	NO	NO	NO	NO	NO	NO	NO	NO
EU-20.a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
EU-20.b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	NO	NO	NO	NO	NO	NO	NO	NO
22	Noncumulative or cumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
30	Write-down features	NO	YES	YES	YES	YES	NO	NO	NO
31	If write-down, write-down trigger(s)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
32	If write-down, full or partial	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
33	If write-down, permanent or temporary	N/A	The Issuer shall write off the outstanding nominal amount of each Bond (in whole or in part, as applicable) if the Bank's CET1 Capital Ratio and/or the Group's CET1 Capital Ratio (as applicable) is less than 7% .	The Issuer shall write off the outstanding nominal amount of each Bond (in whole or in part, as applicable) if the Bank's CET1 Capital Ratio and/or the Group's CET1 Capital Ratio (as applicable) is less than 7% .	The Issuer shall write off the outstanding nominal amount of each Bond (in whole or in part, as applicable) if the Bank's CET1 Capital Ratio and/or the Group's CET1 Capital Ratio (as applicable) is less than 7% .	The Issuer shall write off the outstanding nominal amount of each Bond (in whole or in part, as applicable) if the Bank's CET1 Capital Ratio and/or the Group's CET1 Capital Ratio (as applicable) is less than 7% .	N/A	N/A	N/A
34	If temporary write-down, description of write-up mechanism	N/A	The Issuer may, at its sole and absolute discretion, reinstate the outstanding nominal amount of the Bonds (in whole or in part, as applicable) if the Bank's CET1 Capital Ratio and/or the Group's CET1 Capital Ratio (as applicable) is again greater than 7%.	The Issuer may, at its sole and absolute discretion, reinstate the outstanding nominal amount of the Bonds (in whole or in part, as applicable) if the Bank's CET1 Capital Ratio and/or the Group's CET1 Capital Ratio (as applicable) is again greater than 7%.	The Issuer may, at its sole and absolute discretion, reinstate the outstanding nominal amount of the Bonds (in whole or in part, as applicable) if the Bank's CET1 Capital Ratio and/or the Group's CET1 Capital Ratio (as applicable) is again greater than 7%.	The Issuer may, at its sole and absolute discretion, reinstate the outstanding nominal amount of the Bonds (in whole or in part, as applicable) if the Bank's CET1 Capital Ratio and/or the Group's CET1 Capital Ratio (as applicable) is again greater than 7%.	N/A	N/A	N/A
34.a	Type of subordination (only for eligible liabilities)	Round after all subordinated and non-subordinated liabilities	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims
ES-34.b	Ranking of the instrument in normal insolvency proceedings	Round after all subordinated and non-subordinated liabilities	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Round after all subordinated and non-subordinated liabilities	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims	Round after non-subordinated claims but before shareholder claims
36	Non-compliant transitioned features	NO	NO	NO	NO	NO	NO	NO	NO
37	If yes, specify non-compliant features	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
37.a	Link to the full term and conditions of the instrument (signposting)	www.bluorbank.lv	www.bluorbank.lv	www.bluorbank.lv	www.bluorbank.lv	www.bluorbank.lv	www.bluorbank.lv	www.bluorbank.lv	www.bluorbank.lv
(1) Insert 'N/A' if the question is not applicable									

(1) Insert 'N/A' if the question is not applicable

Template EU CCyB1 – Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer.

EUR'000

		a	b	c	d	e	f	g	h	i	j	k	l	m
		General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements				Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
								Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total			
010	Breakdown by country:													
1	ANTIGUA AND BARBUDA	22 899		-			22 899	1 506	-		1 506	18 820	3.2587%	0.00%
2	ARMENIA	-		-			-	-	-		-	-	0.0000%	1.50%
3	ANGOLA	-		-			-	-	-		-	-	0.0000%	0.00%
4	ARGENTINA	780		-			780	94	-		94	1 171	0.2027%	0.00%
5	AUSTRIA	1 068		-			1 068	85	-		85	1 068	0.1850%	0.00%
6	AZERBAIJAN	31		-			31	2	-		2	31	0.0054%	0.00%
7	BELGIUM	3 877		-			3 877	310	-		310	3 877	0.6713%	1.00%
8	BULGARIA	4 037		-			4 037	260	-		260	3 251	0.5629%	2.00%
9	BELARUS	-		-			-	-	-		-	-	0.0001%	0.00%
10	BELIZE	444		-			444	36	-		36	444	0.0770%	0.00%
11	CANADA	-		-			-	-	-		-	-	0.0001%	0.00%
12	SWITZERLAND	5 646		-			5 646	452	-		452	5 646	0.9776%	0.00%
13	CYPRUS	2 398		-			2 398	147	-		147	1 837	0.3180%	1.00%
14	CZECH REPUBLIC	987		-			987	79	-		79	987	0.1710%	1.25%
15	GERMANY	12		-			12	1	-		1	12	0.0021%	0.75%
16	DENMARK	57		-			57	5	-		5	57	0.0099%	2.50%
17	ESTONIA	9 883		-			9 883	695	-		695	8 686	1.5040%	1.50%
18	SPAIN	1		-			1	-	-		-	1	0.0001%	0.00%
19	FINLAND	30		-			30	2	-		2	30	0.0051%	0.00%
20	FRANCE	3 275		-			3 275	242	-		242	3 022	0.5232%	1.00%
21	UNITED KINGDOM	21 159		-			21 159	1 692	-		1 692	21 150	3.6620%	2.00%

22	HUNGARY	-		-			-	-	-		-	-	0.0001%	0.50%
23	IRELAND	-		-			-	-	-		-	-	0.0000%	1.50%
24	ISRAEL	-		-			-	-	-		-	-	0.0001%	0.00%
25	ITALY	3 922		-			3 922	354	-		354	4 422	0.7656%	0.00%
26	KAZAKHSTAN	696		-			696	84	-		84	1 044	0.1808%	0.00%
27	LIBERIA	16 271		-			16 271	1 089	-		1 089	13 612	2.3568%	0.00%
28	LITHUANIA	30 788		-			30 788	2 417	-		2 417	30 214	5.2315%	1.00%
29	LUXEMBOURG	-		-			-	-	-		-	-	0.0000%	0.50%
30	LATVIA	416 963		-			416 963	31 299	-		31 299	391 231	67.7405%	0.50%
31	MARSHALL ISLANDS	43 918		-			43 918	3 383	-		3 383	42 290	7.3224%	0.00%
32	MALTA	1 225		-			1 225	75	-		75	934	0.1616%	0.00%
33	MEXICO	1 034		-			1 034	124	-		124	1 551	0.2686%	0.00%
34	NETHERLANDS	7		-			7	1	-		1	7	0.0012%	2.00%
35	NORWAY	5 071		-			5 071	81	-		81	1 015	0.1758%	2.50%
36	POLAND	938		-			938	75	-		75	938	0.1624%	0.00%
37	RUSSIAN FEDERATION	6		-			6	-	-		-	6	0.0010%	0.00%
38	SWEDEN	515		-			515	41	-		41	515	0.0891%	2.00%
39	SINGAPORE	13 241		-			13 241	884	-		884	11 051	1.9134%	0.00%
40	SLOVENIA	1 190		-			1 190	143	-		143	1 785	0.3091%	0.50%
41	TURKMENISTAN	179		-			179	22	-		22	269	0.0466%	0.00%
42	TURKEY	1 438		-			1 438	115	-		115	1 438	0.2490%	0.00%
43	UKRAINE	29		-			29	3	-		3	44	0.0076%	0.00%
44	United States	1 031		-			1 031	83	-		83	1 031	0.1786%	0.00%
45	Uzbekistan	2 677		-			2 677	225	-		225	2 807	0.4861%	0.00%
46	SAINT VINCENT AND THE GRENADINES	1 637		-			1 637	100	-		100	1 247	0.2160%	0.00%
020	Total	619 364	-	-	-	-	619 364	46 204	-	-	46 204	577 544	100.0000%	

Template EU CCyB2 – Amount of institution-specific countercyclical capital buffer.

EUR'000

		a
1	Total risk exposure amount	652 518
2	Institution specific countercyclical capital buffer rate	0.5233%
3	Institution specific countercyclical capital buffer requirement	3 415

Template EU LR1 – LRSum: Summary reconciliation of accounting assets and leverage ratio exposures.

EUR'000

		a
		Applicable amount
1	Total assets as per published financial statements	1 035 473
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	863
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	
4	(Adjustment for temporary exemption of exposures to central banks (if applicable))	
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	
7	Adjustment for eligible cash pooling transactions	
8	Adjustment for derivative financial instruments	
9	Adjustment for securities financing transactions (SFTs)	
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	56 913
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	
EU-11.a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	
ES-11.b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	
12	Other adjustments	-2 318
13	Total exposure measure	1 090 931

Template EU LR2 – LRCom: Leverage ratio common disclosure.

		EUR'000	CRR leverage ratio exposures	
			a	b
			T	T-1
On-balance sheet exposures (excluding derivatives and SFTs)				
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)		1 035 501	954 121
2	Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework			
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)			
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)			
5	(General credit risk adjustments to on-balance sheet items)			
6	(Asset amounts deducted in determining Tier 1 capital)		-1 483	-1 657
7	Total on-balance sheet exposures (excluding derivatives and SFTs)		1 034 018	952 464
Derivative exposures				
8	Replacement cost associated with SA-CCR derivatives transactions (i.e. net of eligible cash variation margin)			
EU-8.a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach			
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions			
EU-9.a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach			
ES-9.b	Exposure determined under Original Exposure Method			
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)			
EU-10.a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)			
ES-10.b	(Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)			
11	Adjusted effective notional amount of written credit derivatives			
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)			
13	Total derivatives exposures			
Securities financing transaction (SFT) exposures				
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions			
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)			
16	Counterparty credit risk exposure for SFT assets			
EU-16.a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR			
17	Agent transaction exposures			
EU-17.a	(Exempted CCP leg of client-cleared SFT exposure)			
18	Total securities financing transaction exposures			
Other off-balance sheet exposures				
19	Off-balance sheet exposures at gross notional amount		121 393	93 845
20	(Adjustments for conversion to credit equivalent amounts)		-64 602	-53 863
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated associated with off-balance sheet exposures)		121	421

22	Off-balance sheet exposures	56 913	40 403
Excluded exposures			
EU-22.a	(Exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)		
ES-22.b	(Exposures exempted in accordance with point (j) of Article 429a(1) CRR (on and off balance sheet))		
ES-22.c	(Excluded exposures of public development banks (or units) - Public sector investments)		
ES-22.d	(Excluded exposures of public development banks (or units) - Promotional loans)		
ES-22.e	(Excluded passing-through promotional loan exposures by non-public development banks (or units))		
ES-22.f	(Excluded guaranteed parts of exposures arising from export credits)		
EU-22.g	(Excluded excess collateral deposited at triparty agents)		
ES-22.h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)		
ES-22.i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)		
ES-22.j	(Reduction of the exposure value of pre-financing or intermediate loans)		
ES-22.k	(Total exempted exposures)		
Capital and total exposure measure			
23	Tier 1 capital	90 406	81 488
24	Total exposure measure	1 090 931	992 867
Leverage ratio			
25	Leverage ratio (%)	8.2870%	8.2074%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	8.2870%	8.2074%
25.a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	8.2870%	8.2074%
26	Regulatory minimum leverage ratio requirement (%)	3.0000%	3.0000%
EU-26.a	Additional own funds requirements to address the risk of excessive leverage (%)	0.0000%	0.0000%
ES-26.b	of which: to be made up of CET1 capital	0.0000%	0.0000%
27	Leverage ratio buffer requirement (%)	0.0000%	0.0000%
EU-27.a	Overall leverage ratio requirement (%)	3.0000%	3.0000%
Choice on transitional arrangements and relevant exposures			
ES-27.b	Choice on transitional arrangements for the definition of the capital measure		
Disclosure of mean values			
28	Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivable		
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables		
30	Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	1 090 931	992 867
30.a	Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	1 090 931	992 867
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	8.2870%	8.2074%
31.a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	8.2870%	8.2074%

Template EU LR3 – LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures).

EUR'000

		a
		CRR leverage ratio exposures
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	1 035 501
EU-2	Trading book exposures	
EU-3	Banking book exposures, of which:	
EU-4	Covered bonds	
EU-5	Exposures treated as sovereigns	455 094
EU-6	Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	967
EU-7	Institutions	12 528
EU-8	Secured by mortgages of immovable properties	5 379
EU-9	Retail exposures	
EU-10	Corporates	481 426
EU-11	Exposures in default	16 238
EU-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	63 869

Template EU LIQ1 – Quantitative information of LCR.

Scope of consolidation: consolidated

		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU1.a	Quarter ending on 30 of December 2024	T	T-1	T-2	T-3	T	T-1	T-2	T-3
EU 1.b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS									
1	Total high-quality liquid assets (HQLA), after application of haircuts in line with Article 9 of regulation (EU) 2015/61					421 750	399 856	350 604	310 195
CASH - OUTFLOWS									
2	retail deposits and deposits from small business customers, of which:	389 017	390 478	373 668	361 462	42 020	39 848	32 780	31 502
3	Stable deposits	1 958	1 667	1 591	1 892	98	83	80	95
4	Less stable deposits	46 500	36 536	33 523	32 617	5 767	4 776	4 372	4 239
5	Unsecured wholesale funding	367 273	344 831	310 157	273 090	243 881	226 578	196 912	164 795
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	53 856	57 363	58 224	58 286	13 332	14 208	14 422	14 442
7	Non-operational deposits (all counterparties)	313 417	287 468	251 933	214 804	230 549	212 370	182 490	150 353
8	Unsecured debt	-	-	-	-	-	-	-	-
9	Secured wholesale funding					-	-	-	-
10	Additional requirements	81 642	76 139	65 623	62 439	11 551	10 260	9 507	9 075
11	Outflows related to derivative exposures and other collateral requirements	-	-	1 154	2 298	-	-	1 154	2 298
12	Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-
13	Credit and liquidity facilities	81 642	76 139	64 469	60 141	11 551	10 260	8 353	6 778
14	Other contractual funding obligations	289	63	58	22	363	66	58	22
15	Other contingent funding obligations	-	-	-	-	-	-	-	-
16	TOTAL CASH OUTFLOWS					297 815	276 753	239 257	205 395
CASH - INFLOWS									
17	Secured lending (e.g. reverse repos)	-	-	-	-	-	-	-	-
18	Inflows from fully performing exposures	29 167	28 273	26 415	27 139	16 630	15 715	13 995	14 039
19	Other cash inflows	457	832	2 050	3 411	457	832	2 050	3 411

EU-19.a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)					457	832	2 050	3 411
ES-19.b	(Excess inflows from a related specialised credit institution)							-	-
20	TOTAL CASH INFLOWS	29 624	29 105	28 465	30 550	17 086	16 547	16 045	17 450
EU-20.a	<i>Fully exempt inflows</i>	-	-	-	-	-	-	-	-
EU-20.b	<i>Inflows subject to 90% cap</i>	-	-	-	-	-	-	-	-
EU-20.c	<i>Inflows subject to 75% cap</i>	29 624	29 105	28 465	30 550	17 086	16 547	16 045	17 450
TOTAL ADJUSTED VALUE									
EU-21	LIQUIDITY BUFFER					421 750	399 856	350 604	310 195
22	TOTAL NET CASH OUTFLOWS					280 729	260 205	223 212	187 945
23	LIQUIDITY COVERAGE RATIO					1.50585	1.55084	1.57215	1.67692

Table EU LIQB on qualitative information on LCR, which complements template EU LIQ1.

Row number	Qualitative information - Free format	
a)	Explanations on the main drivers of LCR results and the evolution of the contribution of inputs to the LCR's calculation over time	The result of the LCR is facilitated by the size of the liquidity buffer consisting predominantly of balances with the Central Bank and EU central government bonds, the volume of outflows consisting predominantly of balances on current accounts and term deposits, as well as incoming cash flows from lending transactions and balances on nostro accounts. Over time, as the loan portfolio increases, the ratio may decrease, however, when new deposits are attracted, the ratio increases.
b)	Explanations on the changes in the LCR over time	When placing financing in illiquid assets, including loans, liquidity reserves decrease and, consequently, the ratio decreases. Also, during periods when some concentrated part of term deposits falls on the 30-day horizon, outgoing cash flows increase and, as a result, the ratio decreases. The increase in the ratio is facilitated by attracting financing both in term deposits and in the form of balances on current accounts.
c)	Explanations on the actual concentration of funding sources	Most of the term deposits are attracted from individuals through online deposit platforms. At the level of depositors, they are diversified; term deposits of no more than EUR 100 thousand are attracted from one individual. Concentration is formed by dependence on platforms. The rest of the term deposits mainly consists of financing attracted from various financial institutions. Current account balances are sufficiently well diversified.
d)	High-level description of the composition of the institution's liquidity buffer	The Bank's liquidity buffer as a whole consists of balances with the Central Bank and EU central government bonds.
e)	Derivative exposures and potential collateral calls	The amount of derivative transactions carried out by the Bank is not very significant, mostly they consist of the Bank transactions for hedging the currency position and transactions of the Bank's clients.
f)	Currency mismatch in the LCR	Currency mismatch in the LCR is not significant, 98% of the Bank's assets and 99% of the Bank's liabilities are denominated in EUR.
g)	Other items in the LCR calculation that are not captured in the LCR disclosure template but that the institution considers relevant for its liquidity profile	All important elements contributing to the LCR result are reflected in the LCR disclosure template.

Template EU LIQ2: Net Stable Funding Ratio.

In accordance with Article 451a(3) CRR

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
(in currency amount)		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
	Available stable funding (ASF) Items					
1	Capital items and instruments	90 406	-	-	29 139	119 545
2	Own funds	90 406	-	-	29 139	119 545
3	Other capital instruments		-	-	-	-
4	Retail deposits		272 764	78 139	11 598	327 540
5	Stable deposits		2 586	-	-	2 456
6	Less stable deposits		270 178	78 139	11 598	325 083
7	Wholesale funding:		508 914	16 758	999	137 741
8	Operational deposits		42 912	-	-	16 638
9	Other wholesale funding		466 002	16 758	999	121 103
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	-	803	1 028	12 335	12 849
12	NSFR derivative liabilities	-				
13	All other liabilities and capital instruments not included in the above categories		803	1 028	12 335	12 849
14	Total available stable funding (ASF)					597 675
	Required stable funding (RSF) Items					
15	Total high-quality liquid assets (HQLA)					1 725
EU-15.a	Assets encumbered for a residual maturity of one year or more in a cover pool		-	-	-	-
16	Deposits held at other financial institutions for operational purposes		13 946	-	-	6 973
17	Performing loans and securities:		45 418	67 122	402 069	393 507
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		6 619	50	16 125	16 812
20	Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		24 906	36 850	295 298	344 311
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	305	3 496
22	Performing residential mortgages, of which:		2 621	2 132	71 917	-

23	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		-	-	5 075	-
24	<i>Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products</i>		11 273	28 090	18 729	32 384
25	Interdependent assets		-	-		-
26	Other assets:		19 392	154	42 213	48 733
27	<i>Physical traded commodities</i>				-	-
28	<i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>				-	-
29	<i>NSFR derivative assets</i>				-	-
30	<i>NSFR derivative liabilities before deduction of variation margin posted</i>				-	-
31	<i>All other assets not included in the above categories</i>		19 392	154	42 213	48 733
32	Off-balance sheet items		27 555	18 276	75 562	6 518
33	Total RSF					457 456
34	Net Stable Funding Ratio (%)					130.6518%

Template EU CQ3: Credit quality of performing and non-performing exposures by past due days.

EUR'000

	Gross carrying amount/nominal amount											
	Performing exposures			Non-performing exposures								
		Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
Cash balances at central banks and other demand deposits	416 884	416 884	-	-	-	-	-	-	-	-	-	-
Loans and advances	495 907	495 893	14	24 829	18 973	868	3 084	238	1 651	15	-	24 829
Central banks	-	-	-	-	-	-	-	-	-	-	-	-
General governments	-	-	-	-	-	-	-	-	-	-	-	-
Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-
Other financial corporations	29 015	29 015	-	697	697	-	-	-	-	-	-	697
Non-financial corporations	453 617	453 617	-	23 526	18 042	743	2 949	190	1 602	-	-	23 526
Of which SMEs	403 233	403 233	-	23 472	17 988	743	2 949	190	1 602	-	-	23 472
Households	13 275	13 261	14	606	234	125	135	48	49	15	-	606
Debt securities	69 133	69 133	-	3 060	3 060	-	-	-	-	-	-	3 060
Central banks	-	-	-	-	-	-	-	-	-	-	-	-
General governments	37 048	37 048	-	-	-	-	-	-	-	-	-	-
Credit institutions	6 556	6 556	-	-	-	-	-	-	-	-	-	-
Other financial corporations	787	787	-	1 994	1 994	-	-	-	-	-	-	1 994
Non-financial corporations	24 742	24 742	-	1 066	1 066	-	-	-	-	-	-	1 066
Off-balance-sheet exposures	121 299			94								94
Central banks	-			-								-
General governments	-			-								-
Credit institutions	-			-								-
Other financial corporations	4 590			-								-
Non-financial corporations	115 593			89								89
Households	1 116			5								5
Total	1 103 223	981 910	14	27 983	22 033	868	3 084	238	1 651	15	-	27 983

Template EU CR1-A: Maturity of exposures.

		a	b	c	d	e	f
		Net exposure value					
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances	43 773	77 556	262 322	127 935	-	511 586
2	Debt securities	14 314	12 829	40 896	901	-	68 940
3	Total	58 087	90 385	303 218	128 836	-	580 526

Template EU CR2: Changes in the stock of non-performing loans and advances.

		a
		Gross carrying amount
010	Initial stock of non-performing loans and advances	18 799
020	Inflows to non-performing portfolios	11 051
030	Outflows from non-performing portfolios	-5 022
040	Outflows due to write-offs	-
050	Outflow due to other situations	-5 022
060	Final stock of non-performing loans and advances	24 829

Template EU CR1: Performing and non-performing exposures and related provisions.

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
		Performing exposures			Non-performing exposures			Performing exposures – accumulated impairment and provisions			Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
			Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3			
005	Cash balances at central banks and other demand deposits	416 884	416 884	-	-	-	-	-	-	-	-	-	-	-	-	-
010	Loans and advances	495 907	482 843	13 064	24 829	-	24 829	-559	-546	-13	-8 591	-	-8 591	-	478 869	14 992
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030	General governments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
040	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
050	Other financial corporations	29 015	29 015	-	697	-	697	-5	-5	-	-432	-	-432	-	16 125	-
060	Non-financial corporations	453 617	442 295	11 322	23 526	-	23 526	-465	-455	-10	-7 944	-	-7 944	-	449 856	14 601
070	Of which SMEs	403 233	396 057	7 176	23 472	-	23 472	-331	-330	-1	-7 890	-	-7 890	-	399 608	14 601
080	Households	13 275	11 533	1 742	606	-	606	-89	-86	-3	-215	-	-215	-	12 888	391
090	Debt securities	69 133	68 317	816	3 060	-	3 060	-193	-158	-35	-3 060	-	-3 060	-	-	-
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110	General governments	37 048	37 048	-	-	-	-	-19	-19	-	-	-	-	-	-	-
120	Credit institutions	6 556	6 556	-	-	-	-	-11	-11	-	-	-	-	-	-	-
130	Other financial corporations	787	787	-	1 994	-	1 994	-10	-10	-	-1 994	-	-1 994	-	-	-
140	Non-financial corporations	24 742	23 926	816	1 066	-	1 066	-153	-118	-35	-1 066	-	-1 066	-	-	-
150	Off-balance-sheet exposures	121 299	121 139	160	94	-	94	109	108	1	12	-	12		-	-
160	Central banks	-	-	-	-	-	-	-	-	-	-	-	-		-	-
170	General governments	-	-	-	-	-	-	-	-	-	-	-	-		-	-
180	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-		-	-
190	Other financial corporations	4 590	4 590	-	-	-	-	1	1	-	-	-	-		-	-
200	Non-financial corporations	115 593	115 443	150	89	-	89	86	86	-	9	-	9		-	-
210	Households	1 116	1 106	10	5	-	5	22	21	1	3	-	3		-	-
220	Total	1 103 223	1 089 183	14 040	27 983	-	27 983	-861	-812	-49	-11 663	-	-11 663	-	478 869	14 992

Template EU CQ1: Credit quality of forborne exposures.

		a	b	c	d	e	f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne		Of which impaired	On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures
				Of which defaulted					
005	Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
010	Loans and advances	9 003	2 404	2 404	2 327	-11	-179	11 218	2 225
020	Central banks	-	-	-	-	-	-	-	-
030	General governments	-	-	-	-	-	-	-	-
040	Credit institutions	-	-	-	-	-	-	-	-
050	Other financial corporations	-	-	-	-	-	-	-	-
060	Non-financial corporations	7 695	2 404	2 404	2 327	-9	-179	9 911	2 225
070	Households	1 307	-	-	-	-1	-	1 306	-
080	Debt Securities	-	-	-	-	-	-	-	-
090	Loan commitments given	150	-	-	-	-	-	-	-
100	Total	9 153	2 404	2 404	2 327	-11	-179	11 218	2 225

Template EU CQ7: Collateral obtained by taking possession and execution processes.

		a	b
		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
010	Property, plant and equipment (PP&E)	-	-
020	Other than PP&E	2 814	-1 607
030	<i>Residential immovable property</i>	95	-
040	<i>Commercial Immovable property</i>	2 719	-1 607
050	<i>Movable property (auto, shipping, etc.)</i>	-	-
060	<i>Equity and debt instruments</i>	-	-
070	<i>Other collateral</i>	-	-
080	Total	2 814	-1 607

Template EU CQ4: Quality of non-performing exposures by geography.

		a	b	c	d	e	f	g
		Gross carrying/nominal amount				Accumulated impairment	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which non-performing		Of which subject to impairment				
					Of which defaulted			
010	On-balance-sheet exposures	592 929	27 889	27 889	592 929	-12 403		
020	LATVIA	360 554	6 193	6 193	360 554	-2 837		
070	Other countries	232 375	21 696	21 696	232 375	-9 566		
080	Off-balance-sheet exposures	121 393	94	94			121	
090	LATVIA	94 918	94	94			100	
140	Other countries	26 475	-	-			21	
150	Total	714 322	27 983	27 983	592 929	-11 540	121	

Template EU CQ5: Credit quality of loans and advances to non-financial corporations by industry.

		a	b	c	d	e	f
		Gross carrying amount				Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			Of which non-performing	Of which defaulted	Of which loans and advances subject to impairment		
010	Agriculture, forestry and fishing		33 672	1 670	1 670	33 672	-122
020	Mining and quarrying	-	-	-	-	-	-
030	Manufacturing	46 264	162	162	46 264	-201	-
040	Electricity, gas, steam and air conditioning supply	11 191	-	-	11 191	-10	-
050	Water supply	2 322	-	-	2 322	-4	-
060	Construction	15 260	106	106	15 260	-28	-
070	Wholesale and retail trade	104 256	4 794	4 794	104 256	-3 123	-
080	Transport and storage	100 738	9 365	9 365	100 738	-990	-
090	Accommodation and food service activities	9 118	-	-	9 118	-3	-
100	Information and communication	7	-	-	7	-	-
110	Financial and insurance activities	-	-	-	-	-	-
120	Real estate activities	139 600	-	-	139 600	-22	-
130	Professional, scientific and technical activities	9 305	2 984	2 984	9 305	-1 567	-
140	Administrative and support service activities	5 326	4 445	4 445	5 326	-2 339	-
150	Public administration and defense, compulsory social security	-	-	-	-	-	-
160	Education	84	-	-	84	-	-
170	Human health services and social work activities	-	-	-	-	-	-
180	Arts, entertainment and recreation	-	-	-	-	-	-
190	Other services	-	-	-	-	-	-
200	Total	477 143	23 526	23 526	477 143	-8 409	

Template EU CR2a: Changes in the stock of non-performing loans and advances and related net accumulated recoveries.

		a	b
		Gross carrying amount	Related net accumulated recoveries
010	Initial stock of non-performing loans and advances	18 799	
020	Inflows to non-performing portfolios	11 051	
030	Outflows from non-performing portfolios	-5 022	
040	Outflow to performing portfolio	-	
050	Outflow due to loan repayment, partial or total	-5 022	
060	Outflow due to collateral liquidations	-	-
070	Outflow due to taking possession of collateral	-	-
080	Outflow due to sale of instruments	-	-
090	Outflow due to risk transfers	-	-
100	Outflows due to write-offs	-	
110	Outflow due to other situations	-	
120	Outflow due to reclassification as held for sale	-	
130	Final stock of non-performing loans and advances	24 829	

Template EU CQ2: Quality of forbearance.

		a
		Gross carrying amount of forborne exposures
010	Loans and advances that have been forborne more than twice	1 557
020	Non-performing forborne loans and advances that failed to meet the non-performing exit criteria	-

Template EU CQ6: Collateral valuation – loans and advances.

		a	b	c	d	e	f	g	h	i	j	k	l
		Loans and advances											
		Performing			Non-performing								
				Of which past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days	Of which past due > 90 days ≤ 180 days	Of which: past due > 180 days ≤ 1 year	Of which: past due > 1 years ≤ 2 years	Of which: past due > 2 years ≤ 5 years	Of which: past due > 5 years ≤ 7 years	Of which: past due > 7 years
010	Gross carrying amount	520 736	495 907	14	24 829	18 972	5 857	869	3 084	238	1 651	15	-
020	Of which secured	505 726	481 784	14	23 942	18 260	5 682	860	3 036	185	1 601	-	-
030	Of which secured with immovable property	386 866	372 984	14	13 882	11 360	2 522	835	86	-	1 601	-	-
040	Of which instruments with LTV higher than 60% and lower or equal to 80%	90 155	80 591		9 564	9 478	86						
050	Of which instruments with LTV higher than 80% and lower or equal to 100%	11 508	11 508		-	-	-						
060	Of which instruments with LTV higher than 100%	-	-		-	-	-						
070	Accumulated impairment for secured assets	-8 506	-537	-	-7 969	-4 916	-3 053	-84	-1 934	-121	-914	-	-
080	Collateral												
090	Of which value capped at the value of exposure	493 861	478 869	14	14 992	13 344	1 648	777	120	64	687	-	-
100	Of which immovable property	384 465	372 632	14	11 833	10 332	1 501	755	59	-	687	-	-
110	Of which value above the cap	822 198	777 045	31	45 153	39 096	6 057						
120	Of which immovable property	560 966	546 369	31	14 597	9 703	4 894						
130	Financial guarantees received	-	-	-	-	-	-	-	-	-	-	-	-
140	Accumulated partial write-off	-	-	-	-	-	-	-	-	-	-	-	-

Template EU CQ8: Collateral obtained by taking possession and execution processes – vintage breakdown.

		a	b	c	d	e	f	g	h	i	j	k	l
		Debt balance reduction		Total collateral obtained by taking possession									
		Gross carrying amount	Accumulated negative change	Value at initial recognition	Accumulated negative changes	Foreclosed ≤ 2 years		Foreclosed > 2 years ≤ 5 years		Foreclosed > 5 years		Of which non-current assets held-for-sale	
						Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes
010	Collateral obtained by taking possession classified as PP&E	-	-	-	-								
020	Collateral obtained by taking possession other than that classified as PP&E	-	-	2 814	-1 607	-	-	-	-	2 814	-1 607	-	-
030	<i>Residential immovable property</i>	-	-	95	-	-	-	-	-	95	-	-	-
040	<i>Commercial immovable property</i>	-	-	2 719	-1 607	-	-	-	-	2 719	-1 607	-	-
050	<i>Movable property (auto, shipping, etc.)</i>	-	-	-	-	-	-	-	-	-	-	-	-
060	<i>Equity and debt instruments</i>	-	-	-	-	-	-	-	-	-	-	-	-
070	<i>Other collateral</i>	-	-	-	-	-	-	-	-	-	-	-	-
080	Total	-	-	2 814	-1 607	-	-	-	-	2 814	-1 607	-	-

Template EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques.

		Unsecured carrying amount	Secured carrying amount			
				Of which secured by collateral	Of which secured by financial guarantees	
						Of which secured by credit derivatives
				a	b	c
1	Loans and advances	434 610	493 861	493 861	-	-
2	Debt securities	68 939	-	-	-	
3	Total	503 549	493 861	493 861	-	-
4	<i>Of which non-performing exposures</i>	1 246	14 992	14 992	-	-
EU-5	<i>Of which defaulted</i>	1 246	14 992			

Template EU CR4 – standardised approach – Credit risk exposure and CRM effects.

EUR'000

Exposure classes		Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWAs and RWAs density	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWAs	RWAs density (%)
		a	b	c	d	e	f
1	Central governments or central banks	446 217		455 094	516		0%
2	Regional government or local authorities						
3	Public sector entities	967		967		967	100%
4	Multilateral development banks						
5	International organisations						
6	Institutions	12 528		12 528		4 690	37%
7	Corporates	490 303	101 444	481 426	43 666	458 920	87%
8	Retail						
9	Secured by mortgages on immovable property	5 379		5 379		1 883	35%
10	Exposures in default	16 238	82	16 238	17	21 889	135%
11	Exposures associated with particularly high risk	36 480	19 746	36 480	9 873	69 530	150%
12	Covered bonds						
13	Institutions and corporates with a short-term credit assessment						
14	Collective investment undertakings						
15	Equity	1 393		1 393		1 393	100%
16	Other items	24 891		24 891		23 930	96%
17	TOTAL	1 034 396	121 272	1 034 396	54 072	583 202	54%

Template EU CR5 – Standardised approach.

EUR'000

Exposure classes		Risk weight														Total	Of which unrated
		0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%		
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
1	Central governments or central banks	455 610														455 610	
2	Regional government or local authorities																
3	Public sector entities									967						967	
4	Multilateral development banks																
5	International organisations																
6	Institutions					7 001		4 473			1 054					12 528	
7	Corporates					5 069		506			515 978	3 539				525 093	
8	Retail exposures																
9	Exposures secured by mortgages on immovable property						5 379									5 379	
10	Exposures in default										4 988	11 267				16 255	
11	Exposures associated with particularly high risk											46 353				46 353	
12	Covered bonds																
13	Exposures to institutions and corporates with a short-term credit assessment																
14	Units or shares in collective investment undertakings																
15	Equity exposures										1 393					1 393	
16	Other items	391				712					23 788					24 891	
17	TOTAL	456 001				12 783	5 379	4 979			548 168	61 159				1 088 469	

Template EU CCR1 – Analysis of CCR exposure by approach.

EUR'000

		a	b	c	d	e	f	g	h
		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU-1	EU - Original Exposure Method (for derivatives)				1,4				
EU-2	EU - Simplified SA-CCR (for derivatives)				1,4				
1	SA-CCR (for derivatives)				1,4				
2	IMM (for derivatives and SFTs)								
2.a	<i>Of which securities financing transactions netting sets</i>								
2.b	<i>Of which derivatives and long settlement transactions netting sets</i>								
2.c	<i>Of which from contractual cross-product netting sets</i>								
3	Financial collateral simple method (for SFTs)								
4	Financial collateral comprehensive method (for SFTs)								
5	VaR for SFTs								
6	Total								

Template EU CCR2 – Transactions subject to own funds requirements for CVA risk.

EUR'000

		a	b
		Exposure value	RWEA
1	Total transactions subject to the Advanced method		
2	(i) VaR component (including the 3× multiplier)		
3	(ii) stressed VaR component (including the 3× multiplier)		
4	Transactions subject to the Standardised method		
EU-4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)		
5	Total transactions subject to own funds requirements for CVA risk		

Template EU CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights.

EUR'000

Exposure classes		Risk weight											
		a	b	c	d	e	f	g	h	i	j	k	l
		0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	Total exposure value
1	Central governments or central banks												
2	Regional government or local authorities												
3	Public sector entities												
4	Multilateral development banks												
5	International organisations												
6	Institutions												
7	Corporates												
8	Retail												
9	Institutions and corporates with a short-term credit assessment												
10	Other items												
11	Total exposure value												

Template EU MR1 – Market risk under the standardised approach.

EUR'000

		a
		RWEAs
	Outright products	
1	Interest rate risk (general and specific)	
2	Equity risk (general and specific)	
3	Foreign exchange risk	
4	Commodity risk	
	Options	
5	Simplified approach	
6	Delta-plus approach	
7	Scenario approach	
8	Securitisation (specific risk)	
9	Total	-

Table EU ORA – Qualitative information on operational risk.

Legal basis	Row number	Qualitative information – Free format
Article 435(1)(a) (b)(c)(d) Capital Requirements Regulation (CRR)	a)	<p>In accordance with the Bank's business lines and the complexity of its operations, the Bank develops a Risk Management Strategy and material risk management policies, which are approved by the Supervisory Board.</p> <p>The objective of the Bank's Risk Management Strategy is to establish the fundamental principles for identifying and managing the risks inherent in the Bank's operations, including risk measurement, assessment, control, and the provision of risk reports to the Bank's management or the relevant committee.</p> <p>The objective of managing non-financial risks, including operational risk, is to establish an effective system for managing non-financial risks within the Bank in order to protect the Bank and the Group from various types of financial losses, as well as from reputational damage to the Bank, ensuring the stability and security of its operations. The Bank's management, consisting of the Supervisory Board and the Management Board, is responsible for the overall management of non-financial risks within the Bank and the Group. The execution of comprehensive risk control functions in day-to-day operations, the establishment, oversight, and improvement of the risk management system, as well as the control and monitoring functions related to risk management across all structural units of the Bank, are carried out by the Bank's Chief Risk Officer.</p> <p>The Risk Committee, whose role is to support the Supervisory Board by overseeing the risks to which the Bank and the Group are exposed in their operations, and monitoring the compliance of the Bank's and the Group's activities with the established risk levels, including the supervision of the implementation of the Risk Management Strategy.</p> <p>The Non-Financial Risk Management Committee is responsible for developing and reviewing proposals, as well as making decisions aimed at improving the non-financial risk management system. The operational risk management measures within the Bank are coordinated and controlled by an independent structural unit that is not involved in the Bank's core operations – Operational Risk Management Department (ORMD). ORMD is responsible for developing the approach to operational risk management, the operational risk classification system, for developing and testing the approach to operational risk identification and assessment, and for developing procedures and measures to limit and mitigate operational risk.</p> <p>The Bank classifies operational risks into the following main categories:</p> <ul style="list-style-type: none"> - Personnel risk - Process risk - IT risk - External risk <p>The Bank's operational risk appetite is determined by:</p> <ul style="list-style-type: none"> - Key Risk Indicators (KRIs) and their maximum thresholds; - Stress test scenarios and results. <p>In general, the Bank's operational risk appetite is characterised by:</p> <ul style="list-style-type: none"> - The process of introducing new products and services; - Information on actual and potential losses due to operational risk events. <p>The identification, assessment, control, and reporting of operational risks are organised within each structural unit, in accordance with the specific nature of the business processes and work organisation. Therefore, each Bank employee is responsible for identifying, assessing, mitigating, and reporting risk events within the scope of their daily duties. It is the responsibility of each department head and the member of the board of the Group's commercial entities to promote a strong risk awareness culture within their respective departments.</p> <p>Every employee of the Bank and the Group's commercial entity is obligated to report to ORMD any circumstances that could result in losses for the Bank or the Group's commercial entities, or that may damage the reputation of either the Bank or the Group's commercial entity, as well as the overall reputation of the Group.</p> <p>The Bank applies the following approaches for the identification and assessment of operational risk:</p> <ul style="list-style-type: none"> - Assessing the operational risks inherent in business lines/processes; - Evaluating IT systems and IT infrastructure; - Ensuring that before the introduction of new financial services or significant changes to existing financial services, the associated operational risks are identified and assessed; - Ensuring that the information on complaints from clients and counterparties, data on legal proceedings involving the Bank, and data on sanctions and fines imposed on the Bank is duly registered; - Defining approaches for identifying and managing IT risks; - Organizing operational risk self-assessments; - Defining and monitoring operational risk indicators; - Conducting stress testing; - Assessing the adequacy of the minimum operational risk capital requirement, which is calculated using the Basic Indicator Approach, to cover the operational risks inherent in the operations of the Bank and the Group; - Reviewing the results of external audits and horizontal reviews that include non-financial risks. <p>ORMD, in collaboration with the Bank's structural units, conducts a business impact analysis.</p> <p>The information obtained through the operational risk monitoring process regarding potential changes in the level of operational risk is consolidated semi-annually and submitted to the Non-Financial Risk Management Committee, the Management Board, the Risk Committee, and the Supervisory Board.</p>

Article 446 CRR	b)	<p>To calculate the amount of capital required to cover operational risk, the Bank applies the Basic Indicator Approach as described in the Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012. In addition, the Bank assesses whether compliance with the own funds requirement of the operational risk calculated in accordance with the above approach ensures that the amount of capital required to cover the operational risk thus calculated is sufficient to cover the operational risk inherent in the Bank's activities.</p> <p>When conducting stress testing, the Bank analyses how its level of operational risk, income, or ability to continue operations may be affected by, for example: changes in the operating environment, low-probability events, outsourcing, potential penalties, regulatory changes, and other possible factors. As a result, the Bank determines whether the amount of capital required to cover operational risk, calculated using the Basic Indicator Approach, is sufficient to cover the operational risk inherent in the Bank's activities.</p>
Article 446 CRR	c)	Description of the AMA methodology approach used (if applicable) – not applied.
Article 446 CRR	d)	Disclosure of the use of insurance for risk mitigation in the Advanced Measurement Approach (if applicable) – not applied.

Template EU OR1 – Operational risk own funds requirements and risk-weighted exposure amounts.

Banking activities		a	b	c	d	e
		Relevant indicator			Own funds requirements	Risk exposure amount
		Year-3	Year-2	Last year		
1	Banking activities subject to basic indicator approach (BIA)	26 813	37 783	46 311	5 545	69 317
2	Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches					
3	<u>Subject to TSA:</u>					
4	<u>Subject to ASA:</u>					
5	Banking activities subject to advanced measurement approaches AMA					

Template EU IRRBB1 – Interest rate risks of non-trading book activities.

Supervisory shock scenarios		a	b	c	d
		Changes of the economic value of equity		Changes of the net interest income	
		Current period	Last period	Current period	Last period
1	Parallel up	651 272	-1 494 795	1 269 704	1 390 231
2	Parallel down	-79 563	2 034 456	-1 269 704	-1 390 231
3	Steeper	-12 243	-490 697		
4	Flattener	204 752	290 110		
5	Short rates up	80 276	-422 291		
6	Short rates down	-278 000	296 491		

Table EU IRRBBA – Qualitative information on interest rate risk of non-trading book activities.

Free format text boxes for disclosure of qualitative information

Row number	Qualitative information – Free format	Legal basis
a)	<p>A description of how the institution defines IRRBB for purposes of risk control and measurement.</p> <p>Interest rate risk in the banking book (IRRBB) refers to the potential losses or reduction in profits for the Bank and the Group arising from changes in interest rates at which the Bank and the Group borrow and place funds. Interest rate risk comprises the following components:</p> <ul style="list-style-type: none"> - Basis risk – the risk of incurring losses due to changes in interest rates affecting interest rate-sensitive instruments that have the same repricing or maturity dates but are linked to different reference rates; - Yield curve risk – the risk of incurring losses due to mismatches in the term structure of interest rate-sensitive instruments, covering changes in the interest rate term structure that occur either uniformly across the yield curve (parallel risk) or differently across time intervals (non-parallel risk); - Optionality risk – the risk of incurring losses when interest rate-sensitive instruments contain explicit (e.g., options contracts) or implicit options (e.g., loans with prepayment features, demand deposits, term deposits with early withdrawal options, fixed-rate loan commitments, etc.) that allow either the Bank or its clients to alter the amount or timing of cash flows in response to changes in interest rates. 	Article 448(1), point (e)
b)	<p>A description of the institution's overall IRRBB management and mitigation strategies.</p> <p>Most of the Bank's and the Group's non-trading book assets are interest rate-sensitive assets, in accordance with Regulation No. 254. These assets primarily consist of claims on credit institutions and central banks, as well as portfolios of debt securities and loans. A significant portion of the Bank's and the Group's liabilities also consists of interest rate-sensitive assets, primarily comprising customer term deposits (mostly with maturities of up to one year), demand deposits, subordinated liabilities, as well as off-balance sheet commitments.</p> <p>The mutual delimitation between the non-trading and trading books, as well as the framework and oversight of internal risk transfers between the portfolios, are governed by the Bank's Investment Policy.</p> <p>The Bank and the Group use changes in the economic value of equity (EVE) and net interest income (NII) as the primary approaches for assessing interest rate risk.</p> <p>The economic value of equity of the Bank and the Group represents the net present value (NPV) of the interest rate risk-sensitive instruments' cash flows in the non-trading book, excluding equity from the cash flows. It is calculated over the remaining maturity, which refers to the period from the last day of the assessment period until the contractual maturity date or the date on which the relevant amount must be repaid or the interest rate reset, in accordance with the terms of the agreement.</p> <p>Changes in the economic value of equity (EVE) of the Bank and the Group are defined as the difference between the projected economic value or EVE under a stress scenario and the projected economic value or EVE under a baseline scenario. The baseline scenario is based on forecasts of the Bank's and the Group's operations, economic development, and business environment, and it also takes into account the balance of value impairments.</p> <p>Changes in the net interest income (NII) of the Bank and the Group are defined as the difference between the projected NII under a stress scenario – assuming the continued operation of the Bank and the Group – and the projected NII under a baseline scenario. The baseline scenario is based on forecasts of the Bank's and the Group's operations, economic development, and business environment. Net interest income includes both interest income and interest expenses.</p>	Article 448(1), point (f)

c)	<p>The periodicity of the calculation of the institution's IRRBB measures, and a description of the specific measures that the institution uses to gauge its sensitivity to IRRBB.</p> <p>The Investment Committee reviews the Interest Rate Risk Report once a quarter and whenever new information becomes available indicating a deterioration in the interest rate risk and credit spread risk profile. The report is compiled in both the aggregate of all currencies and in currencies significant to the Bank. The information from the report is included in the Financial Risk Management Report, which is reviewed by the Management Board and the Supervisory Board. In accordance with the BluOr Bank AS Strategy, limits have been established for the Bank and the Group to manage interest rate risk:</p>	Article 448(1), point (e)(i) and (v); Article 448(2)												
	<table><tr><td>Indicator</td><td>Risk appetite</td><td>Risk tolerance</td><td>Risk capacity</td></tr><tr><td>Economic Value of Equity change relative to Tier 1 capital (EVE / T1)</td><td>8.00%</td><td>10.00%</td><td>15.00%</td></tr><tr><td>Net Interest Income change relative to Tier 1 Capital (NII / T1)</td><td>5.00%</td><td>7.50%</td><td>10.00%</td></tr></table>		Indicator	Risk appetite	Risk tolerance	Risk capacity	Economic Value of Equity change relative to Tier 1 capital (EVE / T1)	8.00%	10.00%	15.00%	Net Interest Income change relative to Tier 1 Capital (NII / T1)	5.00%	7.50%	10.00%
Indicator	Risk appetite		Risk tolerance	Risk capacity										
Economic Value of Equity change relative to Tier 1 capital (EVE / T1)	8.00%		10.00%	15.00%										
Net Interest Income change relative to Tier 1 Capital (NII / T1)	5.00%		7.50%	10.00%										
	For the purpose of assessing changes in EVE, the Bank and the Group use the Duration GAP method, while changes in NII are assessed using the Repricing GAP method.													
d)	<p>A description of the interest rate shock and stress scenarios that the institution uses to estimate changes in the economic value and in net interest income (if applicable).</p> <p>In interest rate stress testing, the potential impact of changes in base interest rates (in the currencies essential to the Bank) on EVE and NII is calculated.</p> <p>As stress testing assumptions, the scenarios and assumptions used in supervisory outlier tests are applied, as well as significantly adverse scenarios based on major unfavourable economic development forecasts.</p> <p>The changes in EVE for the Bank and the Group under the most unfavourable scenario are included in the required capital amount for risk coverage in the internal capital adequacy assessment, and the actions the Bank must take in the event of insufficient capital are outlined in the Capital Adequacy Management Policy.</p> <p>Regarding the trading portfolio, given that the Bank's trading (debt securities) portfolio constitutes a small portion of the Bank's assets, and that the majority of the debt securities included in the Bank's trading portfolio have relatively short durations, which means that interest rate risk is not a significant factor determining the market risk associated with investments in these securities, the Bank does not conduct separate interest rate risk stress testing for its trading (debt securities) portfolio. Instead, market risk assessment/stress testing related to the trading (debt securities) portfolio is carried out in accordance with the Methodology for Stress Testing of Market Risk in Debt Securities.</p>	Article 448(1), point (e)(iii); Article 448(2) Article 448(2)												
e)	<p>A description of the key modelling and parametric assumptions different from those used for disclosure of template EU IRRBB1 (if applicable).</p>	Article 448 (1), point (e)(ii); Article 448(2) Article 448(2)												
f)	<p>A high-level description of how the institution hedges its IRRBB, as well as the associated accounting treatment (if applicable).</p> <p>The Bank regularly identifies and assesses its exposure to interest rate risk, and, in order to mitigate this risk, if necessary:</p> <ol style="list-style-type: none">1. The Bank issues loans with variable/floating interest rates or with fixed interest rates for relatively short terms;2. The Bank ensures a relatively low sensitivity of its bond portfolios' value to potential changes in interest rates;3. The Bank strives to maintain a significant positive spread between the interest rates on assets and liabilities, as well as between interest income and expenses, in order to keep its net interest income as high as possible in absolute terms;4. The Bank sets various types of limits related to IRRBB;5. Currently, certain special market instruments for mitigating IRRBB (hedging) are not being used.	Article 448 (1), point (e)(iv); Article 448(2) Article 448(2)												

g)	<p>A description of key modelling and parametric assumptions used for the IRRBB measures in template EU IRRBB1 (if applicable).</p> <p>The unconditional cash flow approach is used for cash flow modelling, where the amount and term of the cash flows are not dependent on a specific interest rate change scenario, but the constructed cash flows are consistently used across all scenarios.</p> <p>In constructing cash flows, the Bank and the Group apply behavioural modelling assumptions for non-maturity deposits (NMDs) – including demand deposits, current accounts, and savings accounts – based on their historical volatility parameters.</p> <p>The option of early withdrawal of term deposits is assessed, and based on the evaluation results, this component is incorporated into the cash flow modelling.</p> <p>The option for early repayment of fixed-rate loans is assessed, and if it is deemed significant, it is incorporated into the cash flow modelling based on the evaluation results.</p> <p>The interbank unsecured overnight rate curve is used as the risk-free yield curve.</p>	Article 448(1), point (c); Article 448(2) Article 448(2)
h)	<p>Explanation of the significance of the IRRBB measures and of their significant variations since previous disclosures.</p> <p>Since the previous disclosure, the approach to calculating EVE and NII changes, as well as the modelling of repricing cash flows, has been revised in accordance with the EBA Guidelines on IRRBB and CSRBB.</p>	Article 448(1), point (d)
i)	Any other relevant information regarding the IRRBB measures disclosed in template EU IRRBB1 (optional).	
(1) (2)	<p>Disclosure of the average and longest repricing maturity assigned to non-maturity deposits.</p> <p>The average repricing maturity assigned to NMD – 0.04 years</p> <p>The longest repricing maturity assigned to NMD – 0.625 years</p>	Article 448(1), point (g)

Table EU REMA – Remuneration policy: Flexible format.

1. Institutions shall disclose the information referred to in points (a), (b), (c), (d), (e), (f), (j) and (k) of Article 450(1) and of Article 450(2) CRR (1) by following the instructions provided below in this Annex to complete table EU REMA which is presented in Annex XXXIII to this Implementing Regulation.
2. This table has a flexible format. In case that institutions apply a different format, they shall provide information comparable with the information required in this table, with a similar level of granularity and including all the substance information required..
3. For the purpose of this table and the templates explained in this annex, award means the granting of variable remuneration for a specific accrual period, independently of the actual point in time where the awarded amount is paid.

Institutions shall describe the main elements of their remuneration policies and how they implement these policies. In particular, the following elements, where relevant, shall be described.

Qualitative disclosures	
a)	<p>AS BluOr Bank, hereinafter referred to as the “Bank”, discloses qualitative information on the 2024 remuneration policy and the fulfilment of the relevant requirements in accordance with the information referred to in points (a), (b), (c), (d), (e), (f), (j) of Article 450(1) and of Article 450(2) CRR, by reporting on the Remuneration Policy in place at the level of the prudential consolidation group, hereinafter referred to as the “Group”. Employees in positions with a material impact on the Group’s risk profile (hereinafter referred to as the “risk takers” or “RTs”), have been identified in two entities: the Bank and the Bank’s parent company, BBG AS, hereinafter referred to as “BBG”.</p> <p>The Bank provides information on the awarding of the variable component of remuneration (hereinafter also referred to as “VR”) to RTs, the procedure for which was developed in accordance with the FCMC Regulation No. 154, “Regulation on Remuneration Policy and Practice”, hereinafter referred to as the “Regulation”, and is governed by the Bank’s internal regulatory documents such as the “Remuneration Policy” and the “Methodology for Determining Remuneration and Identifying Positions that Have an Impact on the Risk Profile”, hereinafter referred to as the “Policy”.</p> <p>The Bank ensures the development of a remuneration system, taking into account that the awarding of the VR is based on sustainable long-term performance results, aligns with the business cycle and operational risks, including ESG risks.</p> <p>Variable remuneration for RTs for the reporting year is determined based on the evaluation of performance results, taking into account the performance indicators of the reporting year and the two preceding years, and relying on the assessment by the Bank’s Risk Director regarding the sustainability of the performance results and their impact on risk, including ESG risks, the quality of capital and liquidity management, and the analysis of changes in external factors.</p> <p>The Bank’s remuneration policy is aligned both with the integration of sustainability risks – since the remuneration of employees and RTs is linked to achieving sustainability objectives and creating long-term value – and with the Bank’s sustainability and ESG strategy. Moreover, the quantitative and qualitative indicators of ESG and sustainability factors, including short-term and long-term metrics, are connected to the employees and RTs whose work results can be directly linked to achieving the Bank’s sustainability and ESG.</p> <p>strategy goals, thereby ensuring an objective evaluation of the achievement of ESG and sustainability factor indicators.</p> <p>Possible changes to the fixed component of remuneration (hereinafter also referred to as “FR”) for the Bank’s and Group’s RTs are planned at the end of each reporting year, during the preparation of proposals for the next year’s budget, taking into account, as far as possible, the macroeconomic situation, the country’s inflation rate, changes in the tax system, the Bank’s financial year results, the professional performance evaluation of RTs, and the results of the risk assessment.</p> <p>The Bank establishes the procedure for awarding remuneration to RTs, observing the following conditions:</p> <ul style="list-style-type: none"> - The shareholders’ meeting determines the remuneration for the supervisory board, i.e., the fixed component of remuneration (FR), aiming to reduce the possibility of conflicts of interest; - The supervisory board determines the fixed and variable remuneration for members of the management board, employees of the internal audit service, and heads of structural units performing internal control functions; - The chairman of the management board determines and approves changes to the fixed remuneration for other RTs; - The supervisory board decides on the awarding and pay-out of the variable remuneration to RTs. <p>In addition to the above, the Nomination and Remuneration Committee, hereinafter referred to as the “Committee,” ensures the direct oversight of the remuneration of senior officials in relation to risk control and operational compliance functions. The remuneration of heads of structural units performing internal control functions is determined based on the achievement of objectives set for the internal control functions, regardless of the operational results achieved in the areas controlled by the internal control functions. Members of the Committee are elected by the Bank’s shareholders’ meeting for a term of three years by a simple majority vote. The Committee consists of four members, who are simultaneously members of the supervisory board, and one of the Committee members is independent. The work of the Committee is led by its chairperson, who is elected by the Bank’s shareholders’ meeting from among the Committee members.</p> <p>The Committee is authorised to consider matters concerning the Bank’s personnel and remuneration policy, the development and oversight of the remuneration system, the determination of remuneration for RTs, the drafting of internal regulatory documents, and the development of remuneration principles at the Group level.</p> <p>In 2024, 10 Committee meetings, 12 supervisory board meetings, and 2 shareholders’ meetings were organised to address matters related to the remuneration of RTs. In improving the 2024 remuneration policy, the Bank has taken into account the opinions of external consultants regarding the fundamental principles for determining remuneration in the Latvian market. For this purpose, the Bank participated in the SIA Figure 2024 remuneration study and used the results of the study in the review of RTs remuneration.</p>
b)	<p>The Bank’s remuneration policy and ESG in 2024</p> <p>The provisions set out in the Policy are applied within the Bank and the Group to the extent that the respective requirements apply to them, establishing procedures to comply with the Policy’s rules both individually and at the Group level. The Bank ensures the necessary information exchange regarding the Policy and the related internal regulatory documents and decisions. The Policy is based on equal determination of the variable remuneration for equal or equivalently valued work, ensuring a gender-neutral Remuneration Policy and its application in practice, which does not conflict with the principles of protecting the interests of clients or depositors and other stakeholders, and does not imply a guaranteed amount of variable remuneration.</p> <p>In enhancing the processes for the implementation and monitoring of the Policy, the Bank has developed performance evaluation criteria and does not provide for <i>ex ante</i> or <i>ex post</i> risk adjustments. The variable remuneration for RTs’ 2024 performance was calculated in both monetary and non-monetary forms.</p>

	<p>Remuneration for RTs performing internal control tasks is determined based on the achievement of objectives set for the internal control functions, regardless of the operational results achieved in the areas controlled by the internal control functions. A monetary limit is set for the VR for RTs, awarded for the period of the reporting year (calendar year), not exceeding EUR 50,000 and/or not constituting more than one-third of the total annual remuneration. If the VR for the reporting year's results exceeds the set limit, then the VR is awarded in both monetary and non-monetary forms.</p> <p>In 2024, when calculating variable remuneration, three types of remuneration system approaches were applied to RTs:</p> <ol style="list-style-type: none"> 1. VR in monetary form only (the amount of variable remuneration within the limit); 2. VR in both monetary and non-monetary form (the amount of variable remuneration exceeding the limit). The non-monetary variable remuneration was awarded in the form of financial instruments. For determining and awarding RTs variable remuneration amounts exceeding the limit, non-monetary instruments are used. The Bank has developed a Policy on Holding Non-Monetary Instruments regarding the issuance of such instruments, which is established in the Policy. <p>The entire variable remuneration was subject to a deferral system over 4 years, with the amount divided proportionally across the deferred years, with the stipulation that RTs have the right to receive the portion of the variable remuneration for which irrevocable rights were granted;</p> <ol style="list-style-type: none"> 3. The awarding of particularly high amounts of variable remuneration (hereinafter referred to as "PHVR"), which constitute 100% or more of the fixed remuneration determined for RTs in the reporting year. In the event that the variable remuneration for RTs for the reporting year qualifies as PHVR, the Bank, in accordance with the requirements of the Credit Institutions Law, informs the Bank's shareholders and the Bank of Latvia of this fact. <p>The Bank/Group does not award any guaranteed variable remuneration and compensations or benefits when terminating employment relationships beyond the scope established by the Labour Law and does not use a discretionary pension benefit payment system.</p>
c)	<p>When evaluating job performance results and calculating variable remuneration, the Bank assesses current and future risks, taking into account the possibility of adjusting the variable remuneration in the event of weak or negative performance indicators.</p> <p>In 2024, the Bank did not apply a reduction coefficient in the awarding and pay-out of the variable remuneration. Upon evaluating the amount of VR calculated for the reporting year, the Bank concluded that the pay-outs relating to 2024 performance would not have a significant impact on the Bank's capital adequacy and would not compromise the Bank's long-term financial stability. Overall, these pay-outs are aligned with the performance of employees in positions with a material impact on risk (RTs) and the respective structural units, as well as the financial indicators of the Bank and the Group. The sustainability of performance results and the risks undertaken are in line with the Bank's strategy and risk-taking policies.</p>
d)	<p>Considering that variable remuneration is based not only on quantitative commercial criteria, the Bank also takes into account the relevant qualitative criteria, which reflect compliance with applicable regulations, fair treatment of clients, and the quality of services provided to clients.</p> <p>The Bank sets the following proportions between fixed remuneration (FR) and variable remuneration (VR) amounts:</p> <ol style="list-style-type: none"> 1. VR does not exceed 100% of the RTs' FR for the reporting year, for which VR is calculated. However, if the VR for RTs for the reporting year qualifies as PHVR, the decision on awarding such VR is made by the shareholders' meeting. <p>The Bank or BBG shall inform the shareholders of this fact and, without delay but no later than within 5 (five) working days after submitting the draft decision to the shareholders, shall inform the Bank of Latvia in accordance with the requirements of the Credit Institutions Law by submitting the draft resolution of the shareholders' meeting, without disclosing the personal data of the relevant RTs. In addition, evidence shall be provided that the variable remuneration for the relevant RTs has been determined in an amount exceeding the fixed remuneration set for the reporting year, which does not limit the Bank's ability to continue complying with the requirements of the Credit Institutions Law and the Regulation No. 575/2013, particularly regarding capital requirements. Following the decision of the Bank's or BBG shareholders' meeting, the Bank shall immediately inform the Bank of Latvia electronically of this fact.</p>
e)	<p>The Bank's Remuneration Policy principles include quality criteria for individual performance evaluation. Remuneration of employees and RTs is proportional to the associated risk-taking and motivates achieving sustainable results by promoting prudent and effective risk management. It is set sufficiently high to ensure the Bank's long-term business development, attract highly qualified specialists, retain existing staff, and stimulate their professional growth.</p> <p>In turn, VR is granted based on employees' performance results, in accordance with the Bank's values.</p> <p>Risk management deficiencies, non-compliance with regulatory requirements, or breaches of job duties could be considered circumstances indicating that the employee's behaviour does not align with the Bank's values.</p> <p>In 2024, no potential deficiencies were identified.</p> <p>VR is awarded based on the work outcomes for the reporting year, evaluating the workload, type, complexity, and specifics of each structural unit's work, based on the established individual VR calculation criteria.</p> <p>When determining VR, the following conditions are observed:</p> <ol style="list-style-type: none"> 1. VR is determined in accordance with the Bank's/Group's established short-term and long-term goals, endurance assessment, including the evaluation of the sustainability of results over the long term, the Bank's/Group's financial and non-financial indicators, as well as individual work performance; 2. Financial risks are assessed before awarding VR; 2.1. Individual quantitative and qualitative indicators of each staff member in a position with a material impact on the risk profile (RTs) are thoroughly evaluated (for example, compliance with internal regulatory documents and established limits, quality of customer service, achievement of set targets, conformity of submitted client documents to the Bank's requirements, etc.); 2.2. VR may be reduced if the financial performance of the Bank/Group or BBG/Group deteriorates or is negative and/or if the compliance with the Bank's regulatory requirements is not ensured; 2.3. The deferred portion of VR awarded to RTs may be partially or fully reduced if it was awarded based on performance results that were later found to be deliberately misrepresented (malicious conduct) and/or if it was established that the Bank or a commercial company of the Group has incurred losses. 2.4. VR for RTs is calculated for the reporting year based on performance review, taking into account the performance indicators of the reporting year and the two preceding reporting years, which are assessed based on a written conclusion by the Chief Risk Officer.
f)	<p>The Bank's Remuneration Policy, depending on the staff category, consists of the following remuneration elements: a fixed component of remuneration and VR in monetary form for employees; a fixed component of remuneration and VR in monetary and/or non-monetary form for RTs.</p> <p>In 2024, pursuant to the Policy, the determination of VR for RTs incorporated the allocation of a deferred portion of VR.</p> <p>The deferred portion of VR granted for previous reporting periods from 2019 to 2021 (inclusive) continues to be monitored and paid out by the Bank in accordance with the requirements that were in effect at the time of its allocation.</p>

Template EU REM1 - Remuneration awarded for the financial year.

			a	b	c	d
			MB Supervisory function	MB Management function	Other senior management	Other identified staff
1	Fixed remuneration	Number of identified staff	5	4	6	41
2		Total fixed remuneration	753	532	587	1 998
3		Of which: cash-based	753	532	587	1 998
4		(Not applicable in the EU)				
EU-4a		Of which: shares or equivalent ownership interests	0	0	0	0
5		Of which: share-linked instruments or equivalent non-cash instruments	0	0	0	0
EU-5x		Of which: other instruments	0	0	0	0
6		(Not applicable in the EU)				
7		Of which: other forms	0	0	0	0
8		(Not applicable in the EU)				
9	Variable remuneration	Number of identified staff	0	4	4	30
10		Total variable remuneration	0	94	275	454
11		Of which: cash-based	0	94	184	349
12		Of which: deferred	0	0	55	55
EU-13a		Of which: shares or equivalent ownership interests	0	0	0	0
EU-14a		Of which: deferred	0	0	0	0
EU-13b		Of which: share-linked instruments or equivalent non-cash instruments	0	0	91	105
EU-14b		Of which: deferred	0	0	55	55
EU-14x		Of which: other instruments	0	0	0	0
EU-14y		Of which: deferred	0	0	0	0
15		Of which: other forms	0	0	0	0
16		Of which: deferred	0	0	0	0
17	Total remuneration (2 + 10)		753	626	862	2 452

Template EU REM2 – Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff).

		a	b	c	d
		MB Supervisory function	MB Management function	Other senior management	Other identified staff
Guaranteed variable remuneration awards					
1	Guaranteed variable remuneration awards - Number of identified staff	0	0	0	0
2	Guaranteed variable remuneration awards - Total amount	0	0	0	0
3	Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap	0	0	0	0
Severance payments awarded in previous periods, that have been paid out during the financial year					
4	Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff	0	0	0	0
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount	0	0	0	0
Severance payments awarded during the financial year					
6	Severance payments awarded during the financial year - Number of identified staff	0	0	0	0
7	Severance payments awarded during the financial year - Total amount	0	0	0	0
8	Of which paid during the financial year	0	0	0	0
9	Of which deferred	0	0	0	0
10	Of which severance payments paid during the financial year, that are not taken into account in the bonus cap	0	0	0	0
11	Of which highest payment that has been awarded to a single person	0	0	0	0

Template EU REM3 – Deferred remuneration.

	a	b	c	d	e	f	EU - g	EU - h
Deferred and retained remuneration	Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments)	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
1 MB Supervisory function	0	0	0	0	0	0	0	0
2 Cash-based	0	0	0	0	0	0	0	0
3 Shares or equivalent ownership interests	0	0	0	0	0	0	0	0
4 Share-linked instruments or equivalent non-cash instruments	0	0	0	0	0	0	0	0
5 Other instruments	0	0	0	0	0	0	0	0
6 Other forms	0	0	0	0	0	0	0	0
7 MB Management function	0	0	0	0	0	0	0	0
8 Cash-based	0	0	0	0	0	0	0	0
9 Shares or equivalent ownership interests	0	0	0	0	0	0	0	0
10 Share-linked instruments or equivalent non-cash instruments	0	0	0	0	0	0	0	0
11 Other instruments	0	0	0	0	0	0	0	0
12 Other forms	0	0	0	0	0	0	0	0
13 Other senior management	35	0	35	0	0	0	0	0
14 Cash-based	35	0	35	0	0	0	0	0
15 Shares or equivalent ownership interests	0	0	0	0	0	0	0	0
16 Share-linked instruments or equivalent non-cash instruments	0	0	0	0	0	0	0	0
17 Other instruments	0	0	0	0	0	0	0	0
18 Other forms	0	0	0	0	0	0	0	0
19 Other identified staff	31	2	29	0	0	0	2	0
20 Cash-based	31	2	29	0	0	0	2	0
21 Shares or equivalent ownership interests	0	0	0	0	0	0	0	0
22 Share-linked instruments or equivalent non-cash instruments	0	0	0	0	0	0	0	0
23 Other instruments	0	0	0	0	0	0	0	0
24 Other forms	0	0	0	0	0	0	0	0
25 Total amount	66	2	64	0	0	0	2	0

Template EU REM4 – Remuneration of 1 million EUR or more per year.

		a
	EUR	Identified staff that are high earners as set out in Article 450(i) CRR
1	1 000 000 to below 1 500 000	N/A
2	1 500 000 to below 2 000 000	N/A
3	2 000 000 to below 2 500 000	N/A
4	2 500 000 to below 3 000 000	N/A
5	3 000 000 to below 3 500 000	N/A
6	3 500 000 to below 4 000 000	N/A
7	4 000 000 to below 4 500 000	N/A
8	4 500 000 to below 5 000 000	N/A
9	5 000 000 to below 6 000 000	N/A
10	6 000 000 to below 7 000 000	N/A
11	7 000 000 to below 8 000 000	N/A
x	To be extended as appropriate, if further payment bands are needed.	N/A

Template EU REM5 – Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff).

EUR'000		a	b	c	d	e	f	g	h	i	j
		Management body remuneration			Business areas						
		MB Supervisory function	MB Management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other	Total
1	Total number of identified staff										56
2	Of which: members of the MB	5	4	9							
3	Of which: other senior management				1	0	1	3	1	0	
4	Of which: other identified staff				6	13	1	5	16	0	
5	Total remuneration of identified staff	753	626	1 379	604	840	390	676	804	0	
6	Of which: variable remuneration	0	94	94	186	128	243	99	73	0	
7	Of which: fixed remuneration	753	532	1 285	418	712	147	577	731	0	

Template EU AE1 – Encumbered and unencumbered assets.

		Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
			of which notionally eligible EHQLA and HQLA		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	050	060	080	090	100
010	Assets of the reporting institution	12 847	-			960 513	41 441		
030	Equity instruments	-	-	-	-	485	-	485	-
040	Debt securities	4 532	-	-	-	71 163	41 441	71 163	41 441
050	of which: covered bonds	-	-	-	-	-	-	-	-
060	of which: securitisations	-	-	-	-	-	-	-	-
070	of which: issued by general governments	-	-	-	-	41 441	41 441	41 441	41 441
080	of which: issued by financial corporations	221	-	-	-	7 940	-	7 940	-
090	of which: issued by non-financial corporations	4 310	-	-	-	21 782	-	21 782	-
120	Other assets	8 315	-			888 865	-		

Template EU AE2 – Collateral received and own debt securities issued.

		Fair value of encumbered collateral received or own debt securities issued		Unencumbered	
				Fair value of collateral received or own debt securities issued available for encumbrance	
			of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA
		010	030	040	060
130	Collateral received by the reporting institution	-	-	-	-
140	Loans on demand	-	-	-	-
150	Equity instruments	-	-	-	-
160	Debt securities	-	-	-	-
170	of which: covered bonds	-	-	-	-
180	of which: securitisations	-	-	-	-
190	of which: issued by general governments	-	-	-	-
200	of which: issued by financial corporations	-	-	-	-
210	of which: issued by non-financial corporations	-	-	-	-
220	Loans and advances other than loans on demand	-	-	-	-
230	Other collateral received	-	-	-	-
240	Own debt securities issued other than own covered bonds or securitisations	-	-	-	-
241	Own covered bonds and asset-backed securities issued and not yet pledged				
250	TOTAL ASSETS, COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED	12 847	-		

Template EU AE3 – Sources of encumbrance.

		Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
		010	030
010	Carrying amount of selected financial liabilities	0	0

Qualitative information on Environmental risk (in accordance with Article 449a CRR).

Row number	Qualitative information - Free format	
	Business strategy and processes	
a)	Institution's business strategy to integrate environmental factors and risks, taking into account the impact of environmental factors and risks on institution's business environment, business model, strategy and financial planning	<p>The Bank's Council has approved the Bank's Strategy for the next three years, including the core principles of sustainability and ESG risk strategies. Based on the business model and key types of financial services, the Bank and the Group have established a Sustainability and ESG Strategy, which includes short-term, medium-term, and long-term sustainability strategic goals, objectives, and key approaches to achieve them.</p> <p>The foundation of the Sustainability and ESG Strategy is the operation of the Bank and all commercial entities of the Group as sustainable, efficient, and socially responsible businesses with good corporate governance.</p> <p>In its strategy, based on the United Nations Sustainable Development Goals (SDGs), the Bank sets its sustainability objectives for investments and loan portfolios.</p> <p>The UN SDGs that the Bank has chosen as the foundation for its sustainable financing are as follows:</p> <ul style="list-style-type: none"> 7 - Ensure access to affordable, reliable, sustainable and modern energy for all; 8 - Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 9 - Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation; 10 - Reduce inequality within and among countries; 11 - Make cities and human settlements inclusive, safe, resilient and sustainable; 12 - Ensure sustainable consumption and production patterns; 13 - Take urgent action to combat climate change and its impacts; 14 - Conserve and sustainably use the oceans, seas and marine resources for sustainable development; 15 - Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss. <p>Based on the strategy approved by the Bank's Council, the Bank has incorporated specific measures into its internal regulations to ensure the achievement of the sustainability goals set out in the strategy, both directly and indirectly. Before making a decision on financing any new investment or loan project, the Bank evaluates the ESG risks and the project's alignment with the Bank's Strategy.</p>
b)	Objectives, targets and limits to assess and address environmental risk in short-, medium-, and long-term, and performance assessment against these objectives, targets and limits, including forward-looking information in the design of business strategy and processes	
c)	Current investment activities and (future) investment targets towards environmental objectives and EU Taxonomy-aligned activities	
d)	Policies and procedures relating to direct and indirect engagement with new or existing counterparties on their strategies to mitigate and reduce environmental risks	
	Governance	
e)	Responsibilities of the management body for setting the risk framework, supervising and managing the implementation of the objectives, strategy and policies in the context of environmental risk management covering relevant transmission channels	<p>Risk management is a set of measures designed to reduce the likelihood of the Bank and the Group incurring direct or indirect losses from its business activities, as well as to ensure the preservation of the Bank's and the Group's asset values. The organisational structure of risk management is designed to be transparent and appropriate to the size of the Bank and the Group, as well as the risks associated with their activities. The tasks of each organisational unit are defined in the Bank's organisational structure regulations or in separate regulations approved by the Bank's Board. The responsibilities, main tasks, and duties of the organisational units, decision-making bodies, employees, and members of the Board in the risk management processes are outlined in the Bank's regulatory documents.</p> <p>The Council is the Bank's supervisory body, representing the interests of the shareholders, overseeing the activities of the Board, approving the Bank's strategy, Risk Management Strategy and policies, and other relevant documents, and monitoring their implementation within the Bank and across the entire Group. The Council oversees how the Board implements the goals and objectives set out in the Bank's strategy, including monitoring how and to what extent sustainability and ESG risk management objectives are being achieved, regularly receiving reports and information. The Bank has established a Risk Committee, whose purpose is to advise the Council and provide support regarding the Bank's and the Group's current and future risk strategies, including changes to them, considering changes in the Bank's and the Group's operations and external factors, and to assist the Council in monitoring their implementation. The Bank's Board addresses all issues related to the Bank's operations, except those that fall under the competence of the shareholders' meeting and the Council, and regularly provides information to the Bank's Council and the Risk Committee regarding the Bank's and the Group's operations, including information on ESG risk management and the progress in achieving the goals set out in the Bank's Strategy.</p> <p>ESG risk management measures and the evaluation of ESG factors before making decisions on investments or granting new loans are outlined in the Bank's regulatory documents.</p> <p>The Financial Analysis and Financial Risk Management Department and the Chief Risk Officer regularly prepare information for the Council and the Board on ESG risk management.</p> <p>In its regulatory document, which defines the procedure for identifying positions that influence the risk profile and the individuals holding these positions within the Bank and the Group's commercial entities, the Bank has established the procedure and criteria for determining the variable portion of employee remuneration. This document also specifies the criteria for determining the variable portion of remuneration based on the achievement of goals set in the Bank's strategy and Credit Policy, related to environmental risk and the alignment of loan projects with environmentally sustainable goals.</p>
f)	Management body's integration of short-, medium- and long-term effects of environmental factors and risks, organisational structure both within business lines and internal control functions	
g)	Integration of measures to manage environmental factors and risks in internal governance arrangements, including the role of committees, the allocation of tasks and responsibilities, and the feedback loop from risk management to the management body covering relevant transmission channels	
h)	Lines of reporting and frequency of reporting relating to environmental risk	
i)	Alignment of the remuneration policy with institution's environmental risk-related objectives	

	Risk management	
j)	Integration of short-, medium- and long-term effects of environmental factors and risks in the risk framework	<p>The Bank has integrated ESG risk management measures into its processes, starting from the Bank's Strategy, Risk Management Strategy and policies, to procedures and methodologies, in areas where decision-making takes place and regular informing of the Bank's management about the results of achieving the objectives set out in the Bank's Strategy.</p> <p>The Bank has conducted an ESG risk materiality assessment with the further aim of developing the most appropriate Sustainability Strategy for the Bank. The ESG risk materiality assessment conducted by the Bank included an evaluation of the Bank's own assets (investments, loan portfolio), qualitatively and quantitatively assessing the Bank's activities and geographical locations of assets (collateral) involved in exposures, as well as evaluating the Bank's general governance processes, considering the potential short-term and long-term financial impact and impact on reputation based on various criteria. By evaluating the Bank's business types and volumes, the impact of ESG risks on the risks inherent in the Bank's business activities (credit risk, liquidity risk, market risk, and operational risk) was assessed. As a result of the ESG risk materiality assessment, recommendations and tasks were compiled for more effective ESG risk management.</p> <p>To ensure the assessment of ESG risks before transactions are conducted, the Bank has specified in its documents the information and data that need to be collected and evaluated before making a decision, as well as the requirements for documenting the ESG risk assessment.</p>
k)	Definitions, methodologies and international standards on which the environmental risk management framework is based	
l)	Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to environmental risks, covering relevant transmission channels	
m)	Activities, commitments and exposures contributing to mitigate environmental risks	
n)	Implementation of tools for identification, measurement and management of environmental risks	
o)	Results and outcome of the risk tools implemented and the estimated impact of environmental risk on capital and liquidity risk profile	
p)	Data availability, quality and accuracy, and efforts to improve these aspects	
q)	Description of limits to environmental risks (as drivers of prudential risks) that are set, and triggering escalation and exclusion in the case of breaching these limits	
r)	Description of the link (transmission channels) between environmental risks with credit risk, liquidity and funding risk, market risk, operational risk and reputational risk in the risk management framework	

Qualitative information on Social risk (in accordance with Article 449a CRR).

Row number	Qualitative information - Free format	
	Business strategy and processes	
a)	Adjustment of the institution's business strategy to integrate social factors and risks taking into account the impact of social risk on the institution's business environment, business model, strategy and financial planning	As a responsible business operator, the Bank has identified socially responsible measures in its strategy, ensuring an appropriate working environment, personnel development, and engagement within the Bank, as well as undertaking socially responsible initiatives for the benefit of society.
b)	Objectives, targets and limits to assess and address social risk in short-term, medium-term and long-term, and performance assessment against these objectives, targets and limits, including forward-looking information in the design of business strategy and processes	
c)	Policies and procedures relating to direct and indirect engagement with new or existing counterparties on their strategies to mitigate and reduce socially harmful activities	Social risk factors that may be associated with the borrower (company) and its operations are assessed before making a decision on each new loan. The Bank evaluates social risk based on information provided by the client, as well as on publicly available information that may reasonably indicate factors influencing social risk. Social risk is characterised by information about the presence of social elements in the client's operations as a business operator, such as issues related to human rights, labour law compliance, employee environment and engagement, safety, sales practices, product quality and availability, and impact on society.
	Governance	
d)	Responsibilities of the management body for setting the risk framework, supervising and managing the implementation of the objectives, strategy and policies in the context of social risk management covering counterparties' approaches to:	As a responsible business operator, the Bank has identified socially responsible measures in its strategy, ensuring an appropriate working environment, personnel development, and engagement within the Bank, as well as undertaking socially responsible initiatives for the benefit of society.
i)	Activities towards the community and society	
ii)	Employee relationships and labour standards	
iii)	Customer protection and product responsibility	
iv)	Human rights	
e)	Integration of measures to manage social factors and risks in internal governance arrangements, including the role of committees, the allocation of tasks and responsibilities, and the feedback loop from risk management to the management body	
f)	Lines of reporting and frequency of reporting relating to social risk	
g)	Alignment of the remuneration policy in line with institution's social risk-related objectives	

	Risk management	
h)	Definitions, methodologies and international standards on which the social risk management framework is based	As a responsible business operator, the Bank has identified socially responsible measures in its strategy, ensuring an appropriate working environment, personnel development, and engagement within the Bank, as well as undertaking socially responsible initiatives for the benefit of society.
i)	Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to social risk, covering relevant transmission channels	
j)	Activities, commitments and assets contributing to mitigate social risk	
k)	Implementation of tools for identification and management of social risk	
l)	Description of setting limits to social risk and cases to trigger escalation and exclusion in the case of breaching these limits	
m)	Description of the link (transmission channels) between environmental risks with credit risk, liquidity and funding risk, market risk, operational risk and reputational risk in the risk management framework	

Qualitative information on Governance risk (in accordance with Article 449a CRR).

Row number	Qualitative information - Free format	
	Governance	
a)	Institution's integration in their governance arrangements governance performance of the counterparty, including committees of the highest governance body, committees responsible for decision-making on economic, environmental, and social topics	Governance risk factors that may be related to the borrower (company), its operations, planned projects, or collateral are assessed before making a decision on each new loan. The Bank evaluates governance risk based on information provided by the client, as well as publicly available information that may reasonably indicate factors influencing governance risk. Governance risk is characterised by information regarding the presence of corporate governance process elements in the client's operations as a business operator, including an assessment of the transparency of the company's activities, its management structure, and internal control system, if implemented.
b)	Institution's accounting of the counterparty's highest governance body's role in non-financial reporting	
c)	Institution's integration in governance arrangements of the governance performance of their counterparties including:	
i)	Ethical considerations	
ii)	Strategy and risk management	
iii)	Inclusiveness	
iv)	Transparency	
v)	Management of conflict of interest	
vi)	Internal communication on critical concerns	
	Risk management	
d)	Institution's integration in risk management arrangements the governance performance of their counterparties considering:	ESG risk assessment is carried out before each decision on granting a new loan. When making a decision, positively assessed ESG risk factors, including governance risk factors, are taken into account when determining the loan conditions, such as a better interest rate, more favorable collateral-to-loan value ratio, longer repayment schedule, etc.
i)	Ethical considerations	
ii)	Strategy and risk management	
iii)	Inclusiveness	
iv)	Transparency	
v)	Management of conflict of interest	
vi)	Internal communication on critical concerns	

Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity.

	Sector/subsector	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
		Gross carrying amount (Mln EUR)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (Mln EUR)			GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column l): gross carrying amount percentage of the portfolio derived from company-specific reporting	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures		Of which Scope 3 financed emissions						
1	Exposures towards sectors that highly contribute to climate change*	481	31		12	17	-6	0	-5				355	125	0	0	3
2	A - Agriculture, forestry and fishing	34	0		0	2	0	0	0				9	24	0	0	5
3	B - Mining and quarrying	6	5		0	0	0	0	0				6	0	0	0	0
4	B.05 - Mining of coal and lignite																
5	B.06 - Extraction of crude petroleum and natural gas	5	5		0	0	0	0	0				5	0	0	0	0
6	B.07 - Mining of metal ores	1			0	0	0	0	0				1	0	0	0	0
7	B.08 - Other mining and quarrying																
8	B.09 - Mining support service activities																
9	C - Manufacturing	49	0		0	0	0	0	0				38	11	0	0	3
10	C.10 - Manufacture of food products	21			0	0	0	0	0				15	7	0	0	4
11	C.11 - Manufacture of beverages	0			0	0	0	0	0				0	0	0	0	
12	C.12 - Manufacture of tobacco products	0			0	0	0	0	0				0	0	0	0	
13	C.13 - Manufacture of textiles	0			0	0	0	0	0				0	0	0	0	
14	C.14 - Manufacture of wearing apparel	0			0	0	0	0	0				0	0	0	0	
15	C.15 - Manufacture of leather and related products	0			0	0	0	0	0				0	0	0	0	
16	C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	10			0	0	0	0	0				7	3	0	0	3
17	C.17 - Manufacture of pulp, paper and paperboard	0			0	0	0	0	0				0	0	0	0	1
18	C.18 - Printing and service activities related to printing	2			0	0	0	0	0				0	2	0	0	6
19	C.19 - Manufacture of coke oven products	0			0	0	0	0	0				0	0	0	0	
20	C.20 - Production of chemicals	0			0	0	0	0	0				0	0	0	0	2
21	C.21 - Manufacture of pharmaceutical preparations	0			0	0	0	0	0				0	0	0	0	
22	C.22 - Manufacture of rubber products	0			0	0	0	0	0				0	0	0	0	4
23	C.23 - Manufacture of other non-metallic mineral products	6			0	0	0	0	0				6	0	0	0	2
24	C.24 - Manufacture of basic metals	0			0	0	0	0	0				0	0	0	0	
25	C.25 - Manufacture of fabricated metal products, except machinery and equipment	9			0	0	0	0	0				9	0	0	0	2
26	C.26 - Manufacture of computer, electronic and optical products	0			0	0	0	0	0				0	0	0	0	
27	C.27 - Manufacture of electrical equipment	0			0	0	0	0	0				0	0	0	0	
28	C.28 - Manufacture of machinery and equipment n.e.c.	0			0	0	0	0	0				0	0	0	0	
29	C.29 - Manufacture of motor vehicles, trailers and semi-trailers	1			0	0	0	0	0				1	0	0	0	3
30	C.30 - Manufacture of other transport equipment	0			0	0	0	0	0				0	0	0	0	
31	C.31 - Manufacture of furniture	0			0	0	0	0	0				0	0	0	0	2
32	C.32 - Other manufacturing	0			0	0	0	0	0				0	0	0	0	
33	C.33 - Repair and installation of machinery and equipment	0			0	0	0	0	0				0	0	0	0	
34	D - Electricity, gas, steam and air conditioning supply	13	12		0	1	-1	0	-1				13	0	0	0	2
35	D35.1 - Electric power generation, transmission and distribution	1			0	1	-1	0	-1				1	0	0	0	0
36	D35.11 - Production of electricity	12	12		0	0	0	0	0				12	0	0	0	2
37	D35.2 - Manufacture of gas; distribution of gaseous fuels through mains						0						0	0	0	0	
38	D35.3 - Steam and air conditioning supply						0						0	0	0	0	
39	E - Water supply; sewerage, waste management and remediation activities	3	0		0	0	0	0	0				3	0	0	0	2
40	F - Construction	16	0		0	0	0	0	0				15	1	0	0	3
41	F.41 - Construction of buildings	15			0	0	0	0	0				14	1	0	0	3
42	F.42 - Civil engineering	1			0	0	0	0	0				1	0	0	0	2
43	F.43 - Specialised construction activities	0			0	0	0	0	0				0	0	0	0	1
44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	107	14		0	5	-3	0	-3				89	19	0	0	2
45	H - Transportation and storage	102	0		5	9	-1	0	-1				47	55	0	0	5
46	H.49 - Land transport and transport via pipelines	4			4	0	0	0	0				0	4	0	0	6
47	H.50 - Water transport	55			0	0	0	0	0				42	13	0	0	4
48	H.51 - Air transport	0			0	0	0	0	0				0	0	0	0	
49	H.52 - Warehousing and support activities for transportation	43			1	9	-1	0	-1				5	38	0	0	6
50	H.53 - Postal and courier activities	0			0	0	0	0	0				0	0	0	0	0
51	I - Accommodation and food service activities	9	0		0	0	0	0	0				9	0	0	0	3
52	L - Real estate activities	142	0		7	0	0	0	0				127	14	0	0	4
53	Exposures towards sectors other than those that highly contribute to climate change*	69	6		0	9	-6	0	-6				67	2	0	0	2
54	K - Financial and insurance activities	13	0		0	2	-2	0	-2				13	0	0	0	2
55	Exposures to other sectors (NACE codes J, M - U)	56	6		0	7	-4	0	-4				54	2	0	0	2
56	TOTAL	549	37		12	27	-12	0	-11				422	127	0	0	3

* In accordance with the Commission delegated regulation EU) 2020/1818 supplementing regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks - Climate Benchmark Standards Regulation - Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006.

i) - k) The Bank is developing a methodology for calculating GHG financed emissions. Client (legal entities forming the credit portfolio) surveys have been initiated, as a result of which the Bank plans to collect data on the estimated Scope 1 and Scope 2 GHG emissions of counterparties.

c) The Bank is developing a methodology for identifying environmentally sustainable (CCM) assets.

Banking book – Climate change transition risk: Loans collateralised by immovable property – Energy efficiency of the collateral.

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
Counterparty sector		Total gross carrying amount amount (in MEUR)															
		Level of energy efficiency (EP score in kWh/m² of collateral)							Level of energy efficiency (EPC label of collateral)							Without EPC label of collateral	
		0; <= 100	> 100; <= 200	> 200; <= 300	> 300; <= 400	> 400; <= 500	> 500	A	B	C	D	E	F	G	Of which level of energy efficiency (EP score in kWh/m² of collateral) estimated		
1	Total EU area	268	18	36	17	0	0	0	9	36	8	1	18	0	0	196	0
2	Of which Loans collateralised by commercial immovable property	211	14	35	17	0	0	0	5	35	8	1	18	0	0	144	
3	Of which Loans collateralised by residential immovable property	57	4	1	0	0	0	0	3	1	0	1	0	0	0	52	
4	Of which Collateral obtained by taking possession: residential and commercial immovable properties																
5	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated																
6	Total non-EU area	3	0	0	0	0	0	0	0	0	0	0	0	0	0	3	0
7	Of which Loans collateralised by commercial immovable property	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
8	Of which Loans collateralised by residential immovable property	3	0	0	0	0	0	0	0	0	0	0	0	0	0	3	
9	Of which Collateral obtained by taking possession: residential and commercial immovable properties																
10	Of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated																

Loans collateralised by immovable property for which energy certificates are available in the Construction Information System are listed: https://bis.gov.lv/bisp/lv/epc_documents, including those with temporary energy certificates and those whose energy certificate validity has expired. The energy efficiency level for those immovable properties for which energy certificates are not available in the Construction Information System will be determined once the Bank has developed an appropriate methodology for estimating the energy efficiency level of collateral, based on available data for similar types of buildings.

Banking book – Climate change transition risk: Alignment metrics.

	a	b	c	d	e	f	g
	Sector	NACE Sectors (a minima)	Portfolio gross carrying amount (Mn EUR)	Alignment metric**	Year of reference	Distance to IEA NZE2050 in % ***	Target (year of reference + 3 years)
1	Power	Please refer to the list below*	n/a				
2	Fossil fuel combustion		n/a				
3	Automotive		n/a				
4	Aviation		n/a				
5	Maritime transport		n/a				
6	Cement, clinker and lime production		n/a				
7	Iron and steel, coke, and metal ore production		n/a				
8	Chemicals		n/a				
9	... potential additions relevant to the business model of the institution		n/a				

*** PiT distance to 2030 NZE2050 scenario in % (for each metric)

* List of NACE sectors to be considered

IEA sector	Column b - NACE Sectors (a minima) - Sectors required		**Examples of metrics - non-exhaustive list. Institutions shall apply metrics defined by the IEA scenario.
Sector in the tempalte	sector	code	
Maritime transport	shipping	301	Average tonnes of CO ₂ per passenger-km Average gCO ₂ /MJ and Average share of high carbon technologies (ICE).
Maritime transport	shipping	3011	
Maritime transport	shipping	3012	
Maritime transport	shipping	3315	
Maritime transport	shipping	50	
Maritime transport	shipping	501	
Maritime transport	shipping	5010	
Maritime transport	shipping	502	
Maritime transport	shipping	5020	
Maritime transport	shipping	5222	
Maritime transport	shipping	5224	
Maritime transport	shipping	5229	
Power	power	27	Average tonnes of CO ₂ per MWh and Average share of high carbon technologies (oil, gas, coal).
Power	power	2712	
Power	power	3314	
Power	power	35	
Power	power	351	
Power	power	3511	
Power	power	3512	
Power	power	3513	
Power	power	3514	
Power	power	4321	
Fossil fuel combustion	oil and gas	91	Average tons pf CO ₂ per GJ. and Average share of high carbon technologies (ICE).
Fossil fuel combustion	oil and gas	910	
Fossil fuel combustion	oil and gas	192	
Fossil fuel combustion	oil and gas	1920	
Fossil fuel combustion	oil and gas	2014	
Fossil fuel combustion	oil and gas	352	
Fossil fuel combustion	oil and gas	3521	
Fossil fuel combustion	oil and gas	3522	
Fossil fuel combustion	oil and gas	3523	
Fossil fuel combustion	oil and gas	4612	
Fossil fuel combustion	oil and gas	4671	
Fossil fuel combustion	oil and gas	6	
Fossil fuel combustion	oil and gas	61	
Fossil fuel combustion	oil and gas	610	
Fossil fuel combustion	oil and gas	62	
Fossil fuel combustion	oil and gas	620	
Iron and steel, coke, and metal ore production	steel	24	Average tonnes of CO ₂ per tonne of output and Average share of high carbon technologies (ICE).
Iron and steel, coke, and metal ore production	steel	241	
Iron and steel, coke, and metal ore production	steel	2410	
Iron and steel, coke, and metal ore production	steel	242	
Iron and steel, coke, and metal ore production	steel	2420	
Iron and steel, coke, and metal ore production	steel	2434	
Iron and steel, coke, and metal ore production	steel	244	
Iron and steel, coke, and metal ore production	steel	2442	
Iron and steel, coke, and metal ore production	steel	2444	
Iron and steel, coke, and metal ore production	steel	2445	
Iron and steel, coke, and metal ore production	steel	245	
Iron and steel, coke, and metal ore production	steel	2451	
Iron and steel, coke, and metal ore production	steel	2452	
Iron and steel, coke, and metal ore production	steel	25	
Iron and steel, coke, and metal ore production	steel	251	
Iron and steel, coke, and metal ore production	steel	2511	
Iron and steel, coke, and metal ore production	steel	4672	
Iron and steel, coke, and metal ore production	coal	5	
Iron and steel, coke, and metal ore production	coal	51	
Iron and steel, coke, and metal ore production	coal	510	
Iron and steel, coke, and metal ore production	coal	52	
Iron and steel, coke, and metal ore production	coal	520	
Iron and steel, coke, and metal ore production	steel	7	
Iron and steel, coke, and metal ore production	steel	72	
Iron and steel, coke, and metal ore production	steel	729	
Fossil fuel combustion	coal	8	Average tons pf CO ₂ per GJ. and Average share of high carbon technologies (ICE).
Fossil fuel combustion	coal	9	
Cement, clinker and lime production	cement	235	Average tonnes of CO ₂ per tonne of output and Average share of high carbon technologies (ICE).
Cement, clinker and lime production	cement	2351	
Cement, clinker and lime production	cement	2352	
Cement, clinker and lime production	cement	236	
Cement, clinker and lime production	cement	2361	
Cement, clinker and lime production	cement	2363	
Cement, clinker and lime production	cement	2364	
Cement, clinker and lime production	cement	811	
Cement, clinker and lime production	cement	89	
aviation	aviation	3030	Average share of sustainable aviation fuels and Average tonnes of CO ₂ per passenger-km
aviation	aviation	3316	
aviation	aviation	511	
aviation	aviation	5110	
aviation	aviation	512	
aviation	aviation	5121	
aviation	aviation	5223	
automotive	automotive	2815	Average tonnes of CO ₂ per passenger-km and Average share of high carbon technologies (ICE).
automotive	automotive	29	
automotive	automotive	291	
automotive	automotive	2910	
automotive	automotive	292	
automotive	automotive	2920	
automotive	automotive	293	
automotive	automotive	2932	

The Bank has not yet calculated its sector alignment with the Paris Agreement, but plans to develop a methodology for aligning its sectors with the Paris Agreement.

Banking book – Climate change transition risk: Exposures to top 20 carbon-intensive firms.

	a	b	c	d	e
	Gross carrying amount (aggregate)	Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate)*	Of which environmentally sustainable (CCM)	Weighted average maturity	Number of top 20 polluting firms included
1					

*For counterparties among the top 20 carbon emitting companies in the world.

No exposures to top 20 carbon-intensive firms were identified in the Bank's portfolio.

Banking book – Climate change physical risk: Exposures subject to physical risk.

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	Variable: Geographical area subject to climate change physical risk - acute and chronic events		Gross carrying amount (Mln EUR)												
			of which exposures sensitive to impact from climate change physical events												
			Breakdown by maturity bucket					of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
			<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity							of which Stage 2 exposures	Of which non-performing exposures
1	A - Agriculture, forestry and fishing	n/a													
2	B - Mining and quarrying	n/a													
3	C - Manufacturing	n/a													
4	D - Electricity, gas, steam and air conditioning supply	n/a													
5	E - Water supply; sewerage, waste management and remediation activities	n/a													
6	F - Construction	n/a													
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	n/a													
8	H - Transportation and storage	n/a													
9	L - Real estate activities	n/a													
10	Loans collateralised by residential immovable property	n/a													
11	Loans collateralised by commercial immovable property	n/a													
12	Reposessed colaterals	n/a													
13	Other relevant sectors (breakdown below where relevant)	n/a													

Summary of GAR KPIs.

	KPI			% coverage (over total assets)*
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	
GAR stock	n/a			
GAR flow	n/a			

* % of assets covered by the KPI over banks' total assets

The Bank is developing a methodology for the identification and accounting of GAR-eligible assets.

Mitigating actions: Assets for the calculation of GAR.

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
Million EUR		Total gross carrying amount	Disclosure reference date T														
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				
				Of which specialised lending	Of which transitional	Of which enabling		Of which specialised lending	Of which adaptation	Of which enabling		Of which specialised lending	Of which transitional/adaptation	Of which enabling			
GAR - Covered assets in both numerator and denominator																	
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	n/a															
2	Financial corporations	n/a															
3	Credit institutions																
4	Loans and advances																
5	Debt securities, including UoP																
6	Equity instruments																
7	Other financial corporations																
8	of which investment firms																
9	Loans and advances																
10	Debt securities, including UoP																
11	Equity instruments																
12	of which management companies																
13	Loans and advances																
14	Debt securities, including UoP																
15	Equity instruments																
16	of which insurance undertakings																
17	Loans and advances																
18	Debt securities, including UoP																
19	Equity instruments																
20	Non-financial corporations (subject to NFRD disclosure obligations)	n/a															
21	Loans and advances																
22	Debt securities, including UoP																
23	Equity instruments																
24	Households	n/a															
25	of which loans collateralised by residential immovable property																
26	of which building renovation loans																
27	of which motor vehicle loans																
28	Local governments financing	n/a															
29	Housing financing																
30	Other local governments financing																
31	Collateral obtained by taking possession: residential and commercial immovable properties																
32	TOTAL GAR ASSETS	n/a															
Assets excluded from the numerator for GAR calculation (covered in the denominator)																	
33	EU Non-financial corporations (not subject to NFRD disclosure obligations)	n/a															
34	Loans and advances																
35	Debt securities																
36	Equity instruments																
37	Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	n/a															
38	Loans and advances																
39	Debt securities																
40	Equity instruments																
41	Derivatives	n/a															
42	On demand interbank loans	n/a															
43	Cash and cash-related assets	n/a															
44	Other assets (e.g. Goodwill, commodities etc.)	n/a															
45	TOTAL ASSETS IN THE DENOMINATOR (GAR)	n/a															
Other assets excluded from both the numerator and denominator for GAR calculation																	
46	Sovereigns	n/a															
47	Central banks exposure	n/a															
48	Trading book	n/a															
49	TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR	n/a															
50	TOTAL ASSETS	n/a															

The Bank is developing a methodology for the identification and accounting of GAR-eligible assets.

Mitigating actions: GAR (%).

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af		
		Disclosure reference date T: KPIs on stock																	Disclosure reference date T: KPIs on flows																
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					Proportion of total assets covered	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)							
		Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors						Proportion of new eligible assets funding taxonomy relevant sectors	Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors	Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of total new assets covered					
			Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable							Of which environmentally sustainable						Of which environmentally sustainable						Of which environmentally sustainable			
	Of which specialised lending		Of which transitional	Of which enabling		Of which specialised lending		Of which adaptation	Of which enabling		Of which specialised lending		Of which transitional/adaptation	Of which enabling		Of which specialised lending				Of which transitional	Of which enabling		Of which specialised lending			Of which adaptation	Of which enabling		Of which specialised lending			Of which transitional/adaptation	Of which enabling		
1	GAR	n/a																																	
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation																																		
3	Financial corporations																																		
4	Credit institutions																																		
5	Other financial corporations																																		
6	of which investment firms																																		
7	of which management companies																																		
8	of which insurance undertakings																																		
9	Non-financial corporations subject to NFRD disclosure obligations																																		
10	Households																																		
11	of which loans collateralised by residential immovable property																																		
12	of which building renovation loans																																		
13	of which motor vehicle loans																																		
14	Local government financing																																		
15	Housing financing																																		
16	Other local governments financing																																		
17	Collateral obtained by taking possession: residential and commercial immovable properties																																		

Other climate change mitigating actions that are not covered in the EU Taxonomy.

	a	b	c	d	e	f
	Type of financial instrument	Type of counterparty	Gross carrying amount (million EUR)	Type of risk mitigated (Climate change transition risk)	Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions
1	Bonds (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Financial corporations	1			Energy-efficient buildings: residential and commercial properties based on energy efficiency certificates and building certifications.
2		Non-financial corporations	1			Green energy, sustainable transport.
3		Of which Loans collateralised by commercial immovable property				
4		Other counterparties				
5	Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	Financial corporations				
6		Non-financial corporations	51			Energy efficiency level of class B or higher, sustainable investments in production facilities, construction and renovation of sustainable new buildings, green energy.
7		Of which Loans collateralised by commercial immovable property	21			Energy efficiency level of class B or higher.
8		Households				
9		Of which Loans collateralised by residential immovable property				
10		Of which building renovation loans				
11		Other counterparties				

The Bank discloses information on assets with characteristics contributing to climate change mitigation. Once the Bank has developed a methodology for identifying GAR and has identified GAR assets falling under Regulation (EU) 2020/852, the above-mentioned assets may be reclassified as GAR.